State of Ohio Environmental Protection Agency

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8/18/2008

Certified Mail
Facility ID: 0387040001
Permit Number: P0087946
County: Wood

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

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 6/10/2008. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.state.oh.us/dapc in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
Columbus, Ohio 43215

and

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

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA DAPC, Northwest District Office

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

PRELIMINARY PROPOSED

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

Facility ID: 0387040001
Permit Number: P0087946
Permit Type: Renewal
Issued: 8/18/2008
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

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

Table of Contents

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

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 14

B. Facility-Wide Terms and Conditions 15

C. Emissions Unit Terms and Conditions 18

1. P002, Reinforcement Fiber Weigh-Out Station 19
2. P011, Mixer #18 22
3. P013, Mixer #19 30
4. P016, Littleford Extruder 38
5. P017, Facility Cleaning Solvent 40
6. P021, Mixer #16 45
7. P023, Mixer #17 50
8. P025, Mixer #20 55
9. P026, Extruder #12 63
10. P027, Mixer #9 66
11. P028, Extruder(s) 9A/9B 73
12. P029, 75 gallon Mixer 75
13. P030, Mixer 1 81
14. P031, Mixer 2 86

Authorization

Facility ID: 0387040001
Facility Description: bulk molding compounds.
Application Number(s): A0019041, A0019042, A0019043
Permit Number: P0087946
Permit Description: Renewal Title V Permit
Permit Type: Renewal
Issue Date: 8/18/2008
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number:

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

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

Ohio 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 (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
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

(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
(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

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

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

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

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

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) 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) constitutes a violation of an emission limitation (or control requirement) and, therefore, 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 scheduled maintenance, 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 promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) 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 (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency 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."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northwest District Office.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

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

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

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition 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 contaminent sources once this permit ceases to be enforceable. The permittee

shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.
(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.
(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

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

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

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

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

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

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

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

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

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

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

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

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

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency) 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 (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(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 appropriate Ohio EPA District Office or local air agency 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 appropriate District Office of the Ohio EPA or local air agency 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 Fed. Reg. 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 has 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.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

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

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

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

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

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

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

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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 appropriate Ohio EPA District Office or local air agency. 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 (i.e., postmarked) 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

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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency 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 (i.e., postmarked) 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 potentials to emit; or

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

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) 5.

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, P011, P013, P017, P020, P021, P023, P025, P027, P029, P030, and P031.

   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.

   All the requirements of 40 CFR Part 63, Subpart WWWW have been established in the Title V permit for this facility, which will encompass these emissions units upon reissuance. The applicable sections of 40 CFR Part 63, Subpart WWWW have been cited in the appropriate sections for the non-insignificant emissions units subject to the rule. 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://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

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

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

   a) T001 - 8,000 gallon polyester resin storage tank (PTI #03-6089);

   b) T014 - 12,000 gallon vinyl ester resin storage tank (PTI #03-7934);

   c) T015 - 12,000 gallon styrene monomer storage tank (PTI #03-1274);

   d) T016 - 12,000 gallon vinyl toluene storage tank (PTI #03-1274).

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

4. The above insignificant emissions units are subject to 40 CFR Part 63, Subpart WWWW. The applicable requirements of this rule are summarized below:

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

[40 CFR Part 63, Subpart WWWW]

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

[40 CFR Part 63, Subpart WWWW]

c) Pursuant to 63.5905(a), emissions units T001, T014, T015, and T016 shall meet the requirements in Table 13 to Subpart WWWW of Part 63 - Applicability and Timing of Notifications, Item 1 - If your facility is an existing source subject to this subpart.

[40 CFR Part 63, Subpart WWWW]

d) Pursuant to 63.5910(a), (b), (g), and (h), emissions units T001, T014, T015, and T016 shall meet the requirements in Table 14 to Subpart WWWW of Part 63 - Requirements for Reports, Items 1 and 2, for compliance reports and an immediate startup, shutdown, and malfunction report.

[40 CFR Part 63, Subpart WWWW]

5. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

a) pigment weigh-out station (Z012);

b) catalyst weigh-out station (Z013);

c) quality control laboratory (Z014);

d) dumpster #1 (Z015);

e) dumpster #2 (Z016);

f) pilot plant ventilation hoods (Z017);

g) pilot plant weigh-out stations (Z018); and

h) parts washer (Z019).

C. Emissions Unit Terms and Conditions

1. P002, Reinforcement Fiber Weigh-Out Station

Operations, Property and/or Equipment Description:

Weigh-out station for reinforcement fiber .

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)	3.7 lbs particulate emissions (PE)/hr
b.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-08(B)	none [See b)(2)a.]
d.	OAC rule 3745-17-07(B)	none [See b)(2)b.]

(2) Additional Terms and Conditions

a. This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08. Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

b. Pursuant to OAC rule 3745-17-07(B)(11), OAC rule OAC 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the process baghouse during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the process baghouse on daily basis.

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

(2) Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

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

(3) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop reading immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

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

(4) The acceptable range for the pressure drop across the baghouse is 0.4 to 2 inches of water.

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

(5) This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into the Title V permit for the facility by means of a minor permit modification.

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

e) Reporting Requirements

(1) The permittee shall submit quarterly reports in accordance with the Standard Terms and Conditions of this permit that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pressure drop across the recovery baghouse BH-2 field was outside of the acceptable range;

b. an identification of each incident of deviation described in a. where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in a. where proper records were not maintained for the investigation and/or the corrective action.

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

f) Testing Requirements

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

a. Emission Limitation:

3.7 lbs PE/hr

Applicable Compliance Method:

To determine the actual maximum particulates emission rate (E), the permittee may use the following equation:

E = maximum process throughput*, in tons per hour X [(EF X (1-CE))]

E = particulates emission rate (lbs/hr)

EF = 2.4 lbs PE/ton**

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

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

** This uncontrolled emission factor from AP-42, Table 11.13-2 (originally 3.0 lbs PE/ton) was modified to account for an 80% capture efficiency.

[OAC rule 3745-17-07(C)]

b. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

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

g) Miscellaneous Requirements

None.

2. P011, Mixer #18

Operations, Property and/or Equipment Description:

Mixer used to manufacture bulk molding compounds.

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

(1) d)(8), d)(9), and d)(10).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-09519, issued 08-13-1997)	stack emissions: 0.30 lb particulate emissions (PE)/hr 7.3 tons organic compounds (OC)/yr fugitive emissions: 1.50 lbs PE/hr stack & fugitive emissions: 8.1 tons PE/year
b.	OAC rule 3745-17-11(B)	none [See b)(2)a.]
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-21-07(G)	none [See b)(2)b.]
e.	OAC rule 3745-17-08(B)	none [See b)(2)c.]
f.	OAC rule 3745-17-07(B)	none [See b)(2)d.]
g.	40 CFR Part 63, Subpart WWWW [In accordance with 40 CFR Part 63.5795(b) and 63.5935, this emissions unit is a mixer at an existing BMC manufacturing facility, subject to the work practice standards specified in this section.]	See b)(2)e.
h.	40 CFR 63.1 - 15 (40 CFR 63.5925)	See b)(2)f.

(2) Additional Terms and Conditions

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

b. OAC rule 3745-21-07(G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

It should be noted that on February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC), and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. However, the rule rescindment and new rule have not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP).

c. This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08. Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

d. Pursuant to OAC rule 3745-17-07(B)(11), OAC rule OAC 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.

e. The permittee shall comply with the applicable standards required for operations at existing facilities pursuant to 40 CFR Part 63, Subpart WWWW, as stated in 63.5805(b). Per this regulation, this emissions unit shall meet the requirements stated in Table 4 to Subpart WWWW of Part 63 - Work Practice Standards, Items #6, #7, and #8 - For all mixing or BMC manufacturing operations.

f. Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the process baghouse during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the process baghouse on daily basis.

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

(2) Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the

investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

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

(3) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop reading immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

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

(4) The acceptable range for the pressure drop across the baghouse is 4 to 6 inches of water.

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

(5) This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into the Title V permit for the facility by means of a minor permit modification.

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

(6) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any building openings housing this emissions unit. These building openings shall include, but not limited to, doorways, windows, and roof monitors. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

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

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

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

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

(7) The permittee shall maintain monthly records of the following:

a. the company identification of each type of bulk molding compound mixed;

b. the number of batches mixed;

c. the total OC emissions rate for mixing operations, in pounds per month, using the established emission factor of 0.25 pound OC/batch or as derived from the most recent stack test on this emissions unit or similar mixer, calculated as follows:

(batches of material mixed) X (0.25 pound OC/batch) = pounds OC/month; and

d. the annual OC emissions rate for mixing operations in tons per year [summation of d)(7)c. multiplied by a conversion factor of 1 ton/2000 lbs., for each calendar month to date from January to December].

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

(8) The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (ug/m3): 213,000

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4,470

MAGLC (ug/m3): 5,071

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

(9) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

(10) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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

e) Reporting Requirements

(1) The permittee shall submit quarterly reports in accordance with the Standard Terms and Conditions of this permit that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;

b. an identification of each incident of deviation described in a. where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in a. where proper records were not maintained for the investigation and/or the corrective action.

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

(2) The permittee shall submit semiannual written reports that:

a. identify all days during which any visible fugitive particulate emissions were observed from any building openings housing this emissions unit, and

b. describe any corrective actions taken to eliminate the visible emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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

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

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

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

a. Pursuant to 40 CFR Part 63.5860(a), this emissions unit shall meet the requirements stated in Table 9 to Subpart WWWW of Part 63 - Initial Compliance with Work Practice Standards, Item #6, #7, and #8 - For existing mixing or BMC manufacturing operations.

b. Pursuant to 40 CFR Part 63.5905(a), this emissions unit shall meet the requirements in Table 13 to Subpart WWWW of Part 63 - Applicability and Timing of Notifications, Item 1 - If your facility is an existing source subject to this subpart.

c. Pursuant to 40 CFR Part 63.5910(a), (b), (g), and (h), this emissions unit shall meet the requirements in Table 14 to Subpart WWWW of Part 63 - Requirements for Reports, Items 1 and 2, for compliance reports and an immediate startup, shutdown, and malfunction report.

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

f) Testing Requirements

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

a. Emission Limitation:

0.30 lb PE/hr (stack emissions)

Applicable Compliance Method:

To determine the actual maximum particulates emission rate (E), the permittee may use the following equation:

E = maximum process throughput*, in tons per hour X (EF X (1-CE))

E = particulates emissions rate (lbs/hr)

EF = 2.75 lbs PE/ton**

CE = control efficiency of the control system (assumed to be 99 percent).

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

** from company material balance calculations

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

b. Emission Limitation:

1.50 lbs PE/hr (fugitive emissions)

Applicable Compliance Method:

To determine the actual maximum particulates emission rate (E), the permittee may use the following equation:

E = maximum process throughput*, in tons per hour X 0.69**

E = particulates emission rate (lbs/hr)

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

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

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

c. Emission Limitation:

8.1 tons PE/year (stack and fugitive)

Applicable Compliance Method:

As long as compliance with the hourly emission rates of 0.30 lb PE/hr (stack) and 1.5 lbs PE/hr (fugitive) is maintained, compliance with the annual emission limitation shall be assumed [the 8.1 TPY PE limitation is greater than the

potential to emit for this emissions unit based upon multiplying the hourly PE emission rate (stack and fugitive combined) by 8760].

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

d. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

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

e. Emission Limitation:

7.3 tons organic compounds (OC)/yr

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section d)(7) of this permit.

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

g) Miscellaneous Requirements

(1) None.

3. P013, Mixer #19

Operations, Property and/or Equipment Description:

Mixer used to manufacture bulk molding compounds.

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

(1) d)(8), d)(9), and d)(10).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-09519, issued 08-13-1997)	stack emissions: 0.30 lb particulate emissions (PE)/hr 7.3 tons organic compounds (OC)/yr fugitive emissions: 1.20 lbs PE/hr stack & fugitive emissions: 6.5 tons PE/year
b.	OAC rule 3745-17-11(B)	none [See b)(2)a.]
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-21-07(G)	none [See b)(2)b.]
e.	OAC rule 3745-17-08(B)	none [See b)(2)c.]
f.	OAC rule 3745-17-07(B)	none [See b)(2)d.]
g.	40 CFR Part 63, Subpart WWWW [In accordance with 40 CFR Part 63.5795(b) and 63.5935, this emissions unit is a mixer at an existing BMC manufacturing facility, subject to the work practice standards specified in this section.]	See b)(2)e.
h.	40 CFR 63.1 - 15 (40 CFR 63.5925)	See b)(2)f.

(2) Additional Terms and Conditions

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

b. OAC rule 3745-21-07(G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

It should be noted that on February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC), and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. However, the rule rescindment and new rule have not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP).

c. This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08. Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

d. Pursuant to OAC rule 3745-17-07(B)(11), OAC rule OAC 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.

e. The permittee shall comply with the applicable standards required for operations at existing facilities pursuant to 40 CFR Part 63, Subpart WWWW, as stated in 63.5805(b). Per this regulation, this emissions unit shall meet the requirements stated in Table 4 to Subpart WWWW of Part 63 - Work Practice Standards, Items #6, #7, and #8 - For all mixing or BMC manufacturing operations.

f. Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the process baghouse during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the process baghouse on daily basis.

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

(2) Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the

investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

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

(3) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop reading immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

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

(4) The acceptable range for the pressure drop across the baghouse is 4 to 6 inches of water.

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

(5) This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into the Title V permit for the facility by means of a minor permit modification.

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

(6) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any building openings housing this emissions unit. These building openings shall include, but not limited to, doorways, windows, and roof monitors. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

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

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

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

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

(7) The permittee shall maintain monthly records of the following:

a. the company identification of each type of bulk molding compound mixed;

b. the number of batches mixed;

c. the total OC emissions rate for mixing operations, in pounds per month, using the established emission factor of 0.165 pound OC/batch or as derived from the most recent stack test on this emissions unit or similar mixer, calculated as follows:

(batches of material mixed) X (0.165 pound OC/batch) = pounds OC/month; and

d. the annual OC emissions rate for mixing operations in tons per year [summation of d)(7)c. multiplied by a conversion factor of 1 ton/2000 lbs., for each calendar month to date from January to December].

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

(8) The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (ug/m3): 213,000

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4,470

MAGLC (ug/m3): 5,071

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

(9) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

(10) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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

e) Reporting Requirements

(1) The permittee shall submit quarterly reports in accordance with the Standard Terms and Conditions of this permit that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pressure drop across the recovery baghouse BH-2 field was outside of the acceptable range;

b. an identification of each incident of deviation described in a. where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in a. where proper records were not maintained for the investigation and/or the corrective action.

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

(2) The permittee shall submit semiannual written reports that:

a. identify all days during which any visible fugitive particulate emissions were observed from any building openings housing this emissions unit, and

b. describe any corrective actions taken to eliminate the visible emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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

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

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

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

a. Pursuant to 40 CFR Part 63.5860(a), this emissions unit shall meet the requirements stated in Table 9 to Subpart WWWW of Part 63 - Initial Compliance with Work Practice Standards, Item #6, #7, and #8 - For existing mixing or BMC manufacturing operations.

b. Pursuant to 40 CFR Part 63.5905(a), this emissions unit shall meet the requirements in Table 13 to Subpart WWWW of Part 63 - Applicability and Timing of Notifications, Item 1 - If your facility is an existing source subject to this subpart.

c. Pursuant to 40 CFR Part 63.5910(a), (b), (g), and (h), this emissions unit shall meet the requirements in Table 14 to Subpart WWWW of Part 63 - Requirements for Reports, Items 1 and 2, for compliance reports and an immediate startup, shutdown, and malfunction report.

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

f) Testing Requirements

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

a. Emission Limitation:

0.30 lb PE/hr (stack emissions)

Applicable Compliance Method:

To determine the actual maximum particulates emission rate (E), the permittee may use the following equation:

E = maximum process throughput*, in tons per hour X (EF X (1-CE))

E = particulates emissions rate (lbs/hr)

EF = 2.4 lbs PE/ton**

CE = control efficiency of the control system (assumed to be 99 percent).

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

** This uncontrolled emissions factor from AP-42, Table 11.13-2 (originally 3.0 lbs PE/ton) was modified to account for an 80% capture efficiency.

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

b. Emission Limitation:

1.20 lbs PE/hr (fugitive emissions)

Applicable Compliance Method:

To determine the actual maximum particulates emission rate (E), the permittee may use the following equation:

E = maximum process throughput*, in tons per hour X 0.75**

E = particulates emission rate (lbs/hr)

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

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

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

c. Emission Limitation:

6.5 tons PE/year (stack and fugitive)

Applicable Compliance Method:

As long as compliance with the hourly emission rates of 0.30 lb PE/hr (stack) and 1.2 lbs PE/hr (fugitive) is maintained, compliance with the annual emission limitation shall be assumed [the 6.5 TPY PE limitation is greater than the potential to emit for this emissions unit based upon multiplying the hourly PE emission rate (stack and fugitive combined) by 8760].

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

d. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

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

e. Emission Limitation:

7.3 tons organic compounds (OC)/yr

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section d)(7) of this permit.

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

g) Miscellaneous Requirements

(1) None.

4. P016, Littleford Extruder

Operations, Property and/or Equipment Description:

Bulk molding compound extruder/bulk packing.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-09519, issued 08-13-1997)	1.66 lbs organic compounds (OC)/hr from bulk molding compound (BMC) 7.3 tons OC/yr from BMC See b)(2)a.
b.	OAC rule 3745-21-07(G)	none [See b)(2)b.]

(2) Additional Terms and Conditions

a. Emissions estimates are based on the conservative assumption that the hourly OC emissions rate from the extruder is equal to the daily OC emission rate of the Littleford Mixer, divided by 24. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with these limitations.

b. OAC rule 3745-21-07(G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

It should be noted that on February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC), and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. However, the rule rescindment and new rule have not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

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

a. Emission Limitation:

1.66 lbs OC/hr and 7.3 tons OC/yr from BMC

Applicable Compliance Method:

Emissions estimates are based on the conservative assumption that the hourly OC emissions rate from the extruder is equal to the daily OC emission rate of the Littleford Mixer, divided by 24. Therefore, compliance can be assumed to be maintained based upon the recordkeeping specified in d)(7), for the Littleford Mixer (P011).

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

g) Miscellaneous Requirements

(1) None.

5. P017, Facility Cleaning Solvent

Operations, Property and/or Equipment Description:

Usage of cleaning solvent at facility.

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

(1) d)(2), d)(3), and d)(4).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-09519, issued 08-13-1997)	See b)(2)a.
b.	OAC rule 3745-21-07(G)	none [See b)(2)b.]
c.	40 CFR Part 63, Subpart WWWW [In accordance with 40 CFR Part 63.5795(b) and 63.5935, this emissions unit is a cleaning operation at an existing BMC manufacturing facility, subject to the work practice standards specified in this section.]	See b)(2)c.
d.	40 CFR 63.1 - 15 (40 CFR 63.5925)	See b)(2)d.

(2) Additional Terms and Conditions

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

b. OAC rule 3745-21-07(G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

It should be noted that on February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC), and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. However, the rule rescindment and new rule have not yet

been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP).

c. The permittee shall comply with the applicable standards required for operations at existing facilities pursuant to 40 CFR Part 63, Subpart WWWW, as stated in 63.5805(b). Per this regulation, this emissions unit shall meet the requirements stated in Table 4 to Subpart WWWW of Part 63 - Work Practice Standards, Item #2 - For a new or existing cleaning operation.

d. Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the company identification for each cleanup material employed;

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

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

d. the total organic compound emission rate for all cleanup materials, in pounds (summation of b. x c. for all cleanup materials); and

e. the rolling, 12-month summation of the monthly OC emission rates, in tons.

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

(2) The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methylene chloride

TLV (ug/m3): 174,000

Maximum Hourly Emission Rate (lbs/hr):

Stack FB1: 1.75

Stack DBF1: 1.75

Stack FB2: 1.75

Stack DFB2: 1.75

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,000

MAGLC (ug/m3): 4,142

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

(3) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

(4) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the limitation on the rolling, 12-month summation of OC emissions was exceeded. All quarterly deviation reports shall be submitted in accordance with paragraph 3 of the Standard Terms and Conditions of this permit.

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

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

a. Pursuant to 40 CFR Part 63.5860(a), this emissions unit shall meet the requirements stated in Table 9 to Subpart WWWW of Part 63 - Initial Compliance with Work Practice Standards, Item #2 - For a new or existing cleaning operation.

b. Pursuant to 40 CFR Part 63.5905(a), this emissions unit shall meet the requirements in Table 13 to Subpart WWWW of Part 63 - Applicability and Timing of Notifications, Item 1 - If your facility is an existing source subject to this subpart.

c. Pursuant to 40 CFR Part 63.5910(a), (b), (g), and (h), this emissions unit shall meet the requirements in Table 14 to Subpart WWWW of Part 63 - Requirements for Reports, Item 1, for compliance reports.

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

f) Testing Requirements

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

a. Emission Limitation:

8.5 tons OC per rolling, 12-month period

Applicable Compliance Method:

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

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

g) Miscellaneous Requirements

(1) None.

6. P021, Mixer #16

Operations, Property and/or Equipment Description:

Mixer used to manufacture bulk molding compounds.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)	3.1 lbs particulate emissions (PE)/hr
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-21-07(G)	none [See b)(2)a.]
d.	OAC rule 3745-17-08(B)	none [See b)(2)b.]
e.	OAC rule 3745-17-07(B)	none [See b)(2)c.]
f.	40 CFR Part 63, Subpart WWWW [In accordance with 40 CFR Part 63.5795(b) and 63.5935, this emissions unit is a mixer at an existing BMC manufacturing facility, subject to the work practice standards specified in this section.]	See b)(2)d.
g.	40 CFR 63.1 - 15 (40 CFR 63.5925)	See b)(2)e.

(2) Additional Terms and Conditions

a. OAC rule 3745-21-07(G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

It should be noted that on February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC), and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. However, the rule rescindment and new rule have not yet

been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP).

b. This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08. Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

c. Pursuant to OAC rule 3745-17-07(B)(11), OAC rule OAC 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.

d. The permittee shall comply with the applicable standards required for operations at existing facilities pursuant to 40 CFR Part 63, Subpart WWWW, as stated in 63.5805(b). Per this regulation, this emissions unit shall meet the requirements stated in Table 4 to Subpart WWWW of Part 63 - Work Practice Standards, Items #6, #7, and #8 - For all mixing or BMC manufacturing operations.

e. Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the process baghouse during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the process baghouse on daily basis.

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

(2) Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

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

(3) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop reading

immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

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

(4) The acceptable range for the pressure drop across the baghouse is 4 to 6 inches of water.

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

(5) This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into the Title V permit for the facility by means of a minor permit modification.

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

e) Reporting Requirements

(1) The permittee shall submit quarterly reports in accordance with the Standard Terms and Conditions of this permit that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;

b. an identification of each incident of deviation described in a. where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in a. where proper records were not maintained for the investigation and/or the corrective action.

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

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

a. Pursuant to 40 CFR Part 63.5860(a), this emissions unit shall meet the requirements stated in Table 9 to Subpart WWWW of Part 63 - Initial Compliance with Work Practice Standards, Item #6, #7, and #8 - For existing mixing or BMC manufacturing operations.

b. Pursuant to 40 CFR Part 63.5905(a), this emissions unit shall meet the requirements in Table 13 to Subpart WWWW of Part 63 - Applicability and Timing of Notifications, Item 1 - If your facility is an existing source subject to this subpart.

c. Pursuant to 40 CFR Part 63.5910(a), (b), (g), and (h), this emissions unit shall meet the requirements in Table 14 to Subpart WWWW of Part 63 - Requirements for Reports, Items 1 and 2, for compliance reports and an immediate startup, shutdown, and malfunction report.

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

f) Testing Requirements

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

a. Emission Limitation:

3.1 lbs PE/hr

Applicable Compliance Method:

To determine the actual maximum particulates emission rate (E), the permittee may use the following equation:

E = maximum process throughput*, in tons per hour X [(EF X (1-CE))]

E = particulates emission rate (lbs/hr)

EF = 6.0 lbs PE/ton**

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

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

** from company material balance calculations

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

b. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

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

g) Miscellaneous Requirements

(1) None.

7. P023, Mixer #17

Operations, Property and/or Equipment Description:

Mixer used to manufacture bulk molding compounds.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)	4.1 lbs particulate emissions (PE)/hr
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-21-07(G)	none [See b)(2)a.]
d.	OAC rule 3745-17-08(B)	none [See b)(2)b.]
e.	OAC rule 3745-17-07(B)	none [See b)(2)c.]
f.	40 CFR Part 63, Subpart WWWW [In accordance with 40 CFR Part 63.5795(b) and 63.5935, this emissions unit is a mixer at an existing BMC manufacturing facility, subject to the work practice standards specified in this section.]	See b)(2)d.
g.	40 CFR 63.1 - 15 (40 CFR 63.5925)	See b)(2)e.

(2) Additional Terms and Conditions

a. OAC rule 3745-21-07(G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

It should be noted that on February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC), and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. However, the rule rescindment and new rule have not yet

been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP).

b. This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08. Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

c. Pursuant to OAC rule 3745-17-07(B)(11), OAC rule OAC 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.

d. The permittee shall comply with the applicable standards required for operations at existing facilities pursuant to 40 CFR Part 63, Subpart WWWW, as stated in 63.5805(b). Per this regulation, this emissions unit shall meet the requirements stated in Table 4 to Subpart WWWW of Part 63 - Work Practice Standards, Items #6, #7, and #8 - For all mixing or BMC manufacturing operations.

e. Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the process baghouse during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the process baghouse on daily basis.

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

(2) Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

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

(3) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop reading

immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

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

(4) The acceptable range for the pressure drop across the baghouse is 4 to 6 inches of water.

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

(5) This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into the Title V permit for the facility by means of a minor permit modification.

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

e) Reporting Requirements

(1) The permittee shall submit quarterly reports in accordance with the Standard Terms and Conditions of this permit that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;

b. an identification of each incident of deviation described in a. where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in a. where proper records were not maintained for the investigation and/or the corrective action.

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

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

a. Pursuant to 40 CFR Part 63.5860(a), this emissions unit shall meet the requirements stated in Table 9 to Subpart WWWW of Part 63 - Initial Compliance with Work Practice Standards, Item #6, #7, and #8 - For existing mixing or BMC manufacturing operations.

b. Pursuant to 40 CFR Part 63.5905(a), this emissions unit shall meet the requirements in Table 13 to Subpart WWWW of Part 63 - Applicability and Timing of Notifications, Item 1 - If your facility is an existing source subject to this subpart.

c. Pursuant to 40 CFR Part 63.5910(a), (b), (g), and (h), this emissions unit shall meet the requirements in Table 14 to Subpart WWWW of Part 63 - Requirements for Reports, Items 1 and 2, for compliance reports and an immediate startup, shutdown, and malfunction report.

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

f) Testing Requirements

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

a. Emission Limitation:

4.1 lbs PE/hr

Applicable Compliance Method:

To determine the actual maximum particulates emission rate (E), the permittee may use the following equation:

E = maximum process throughput*, in tons per hour X [(EF X (1-CE))]

E = particulates emission rate (lbs/hr)

EF = 2.4 lbs PE/ton**

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

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

** This uncontrolled emissions factor from AP-42, Table 11.13-2 (originally 3.0 lbs PE/ton) was modified to account for an 80% capture efficiency.

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

b. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

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

g) Miscellaneous Requirements

(1) The permittee installed this emissions unit in 1975 without first applying for and obtaining a permit to install (PTI), in violation of OAC rule 3745-31-02. Therefore, as the initial step for this emissions unit to achieve compliance with the applicable requirements, the permittee shall submit a complete PTI application in accordance with the Notice of Violation letter issued July 3, 2008.

8. P025, Mixer #20

Operations, Property and/or Equipment Description:

Mixer used to manufacture bulk molding compounds.

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

(1) d)(7), d(8), and d)(9).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-13080 modification, issued 11-12-2002)	0.15 pound particulate emissions (PE)/hour, 0.66 ton PE/year 1.88 pounds organic compounds (OC)/hour, 7.3 tons OC/year Visible PE shall not exceed 0% opacity, as a six-minute average.
b.	OAC rule 3745-17-07(A)	See b)(2)a.
c.	OAC rule 3745-17-11(B)	See b)(2)a.
d.	OAC rule 3745-21-07(G)	none [See b)(2)b.]
e.	40 CFR Part 63, Subpart WWWW [In accordance with 40 CFR Part 63.5795(b) and 63.5935, this emissions unit is a mixer at an existing BMC manufacturing facility, subject to the work practice standards specified in this section.]	See b)(2)c.
f.	40 CFR 63.1 - 15 (40 CFR 63.5925)	See b)(2)d.
g.	OAC rule 3745-114 ORC 3704.03(F)	See d)(7), d)(8), and d)(9)

(2) Additional Terms and Conditions

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

b. OAC rule 3745-21-07(G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

It should be noted that on February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC), and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. However, the rule rescindment and new rule have not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP).

c. The permittee shall comply with the applicable standards required for operations at existing facilities pursuant to 40 CFR Part 63, Subpart WWWW, as stated in 63.5805(b). Per this regulation, this emissions unit shall meet the requirements stated in Table 4 to Subpart WWWW of Part 63 - Work Practice Standards, Items #6, #7, and #8 - For all mixing or BMC manufacturing operations.

d. Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the process baghouse during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the process baghouse on daily basis.

[OAC rule 3745-77-07(C)(1) and PTI #03-13080]

(2) Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

[OAC rule 3745-77-07(C)(1) and PTI #03-13080]

(3) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective

action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop reading immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[OAC rule 3745-77-07(C)(1) and PTI #03-13080]

(4) The acceptable range for the pressure drop across the baghouse is 4 to 6 inches of water.

[OAC rule 3745-77-07(C)(1) and PTI #03-13080]

(5) This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into the Title V permit for the facility by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1) and PTI #03-13080]

(6) The permittee shall maintain monthly records of the following information for emissions unit P025:

a. the company identification of each type of bulk molding compound mixed;

b. the number of batches mixed;

c. the total OC emissions rate for mixing operations, in pounds per month, using the established emission factor of 0.94 pound OC/batch or as derived from the most recent stack test on this emissions unit or similar mixer, calculated as follows:

(batches of material mixed) X (0.94 pound OC/batch) = pounds OC/month; and

d. the annual OC emissions rate for mixing operations in tons per year [summation of d)(6)c. multiplied by a conversion factor of 1 ton/2000 lbs., for each calendar month to date from January to December].

[OAC rule 3745-77-07(C)(1) and PTI #03-13080]

(7) The permit to install for emissions unit P025 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level

Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m3): 213.0

Maximum Hourly Emission Rate (lbs/hr): 1.88

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2504.0

MAGLC (ug/m3): 5071.0

[OAC rule 3745-77-07(C)(1) and PTI #03-13080]

(8) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

[OAC rule 3745-77-07(C)(1) and PTI #03-13080]

(9) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[OAC rule 3745-77-07(C)(1) and PTI #03-13080]

e) Reporting Requirements

(1) The permittee shall submit quarterly reports in accordance with the Standard Terms and Conditions of this permit that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;

b. an identification of each incident of deviation described in a. where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in a. where proper records were not maintained for the investigation and/or the corrective action.

[OAC rule 3745-77-07(C)(1) and PTI #03-13080]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13080]

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

a. Pursuant to 40 CFR Part 63.5860(a), this emissions unit shall meet the requirements stated in Table 9 to Subpart WWWW of Part 63 - Initial Compliance with Work Practice Standards, Item #6, #7, and #8 - For existing mixing or BMC manufacturing operations.

b. Pursuant to 40 CFR Part 63.5905(a), this emissions unit shall meet the requirements in Table 13 to Subpart WWWW of Part 63 - Applicability and Timing of Notifications, Item 1 - If your facility is an existing source subject to this subpart.

c. Pursuant to 40 CFR Part 63.5910(a), (b), (g), and (h), this emissions unit shall meet the requirements in Table 14 to Subpart WWWW of Part 63 - Requirements

for Reports, Items 1 and 2, for compliance reports and an immediate startup, shutdown, and malfunction report.

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

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months after permit issuance, unless otherwise approved by Ohio EPA, NWDO.

b. The emission testing shall be conducted to demonstrate compliance with the following allowable mass emission rates for emissions unit P025:

i. 1.88 pounds OC/hour;

ii. 0.15 pound PE/hour.

c. The emissions testing shall be conducted in a manner to obtain the OC emissions (in pounds) generated per batch of bulk molding compound mixed.

d. The emissions testing shall also be conducted in a manner to obtain the PE emissions in terms of a grain loading and air flow, as well as lbs PE/hour.

e. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for PE, Methods 1 through 5 of 40 CFR Part 60, Appendix A, and for OC, Methods 204 through 204F of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

f. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. The test(s) shall also be conducted under "worst case" scenario conditions which will generate the greatest OC and PE emissions.

g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

h. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

i. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1) and PTI #03-13080]

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

a. Emission Limitation:

0.15 lb PE/hour, 0.66 tons PE/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the lbs PE/hour emissions limitation by the emissions testing required in Section f)(1).

Otherwise, to determine the actual maximum particulate emission rate (E), the permittee may use the following equation:

E = maximum process throughput*, in tons per hour X [(EF X (1-CE))]

E = particulates emission rate (lbs/hr)

EF = 6.0 lbs PE/ton**

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

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

** from company material balance calculations

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13080]

b. Emission Limitation:

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

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13080]

c. Emission Limitation:

1.88 pounds OC/hour

Applicable Compliance Method:

The company shall demonstrate compliance with this emission limitation by the emissions testing required in Section f)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-13080]

d. Emission Limitations:

7.3 tons OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the OC emission limitations through the record keeping required in Section d)(6).

[OAC rule 3745-77-07(C)(1) and PTI #03-13080]

g) Miscellaneous Requirements

9. P026, Extruder #12

Operations, Property and/or Equipment Description:

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

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-13080 modification, issued 11-12-2002)	3.30 pounds organic compounds (OC)/hour, 14.45 tons OC/year
b.	OAC rule 3745-21-07(G)	none [See b)(2)a.]

(2) Additional Terms and Conditions

a. OAC rule 3745-21-07(G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

It should be noted that on February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC), and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. However, the rule rescindment and new rule have not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The monitoring and record keeping for this emissions unit is the same as d)(6) for emissions unit P025.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the emissions from emissions unit P026 did not comply with the allowable emission limitations established in Section b)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-13080].

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months after permit issuance, unless otherwise approved by the Ohio EPA, NWDO.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate of 3.30 pounds OC/hour for emissions unit P026. The emissions testing shall be conducted in a manner to obtain the OC emissions (in pounds) generated per batch of bulk molding compound mixed.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1 through 4 of 40 CFR Part 60, Appendix A, and 204 through 204F of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. The test(s) shall also be conducted under "worst case" scenario conditions which will generate the greatest OC emissions.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the

submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1) and PTI #03-13080]

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

a. Emission Limitation:

3.30 pounds OC/hour, 14.45 tons OC/year

Applicable Compliance Method:

The company shall demonstrate compliance with this emission limitation by the emissions testing required in Section f)(1).

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13080].

g) Miscellaneous Requirements

(1) The permittee was required in PTI #03-13080, issued November 12, 2002, to conduct emissions testing for organic compounds (OCs), within 60 days of achieving the maximum production rate. This testing has not been completed, and the company is in violation of this requirement. Therefore, as the initial step to achieve compliance with applicable requirements, the permittee shall submit an Intent to Test, in accordance with the Notice of Violation letter issued July 3, 2008.

10. P027, Mixer #9

Operations, Property and/or Equipment Description:

Mixer used to manufacture bulk molding compounds.

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

(1) d)(6), d)(7), and d)(8).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-17003, issued 01-17-2006)	0.02 grain particulate matter of 10 microns or less (PM10) per dscf, 1.49 tons PM10 per year [see b)(2)a. and b)(2)b. below] 1.67 pounds organic compounds (OC) /hour and 7.3 tons OC/year Visible PE shall not exceed 0% opacity, as a six-minute average.
b.	OAC rule 3745-17-11(B)	none [See b)(2)c.]
c.	OAC rule 3745-17-07(A)	none [See b)(2)d.]
d.	OAC rule 3745-21-07(G)	none [See b)(2)e.]
e.	40 CFR Part 63, Subpart WWWW [In accordance with 40 CFR Part 63.5795(b) and 63.5935, this emissions unit is a mixer at an existing BMC manufacturing facility, subject to the work practice standards specified in this section.]	See b)(2)f.
f.	40 CFR 63.1 - 15 (40 CFR 63.5925)	See b)(2)g.
g.	OAC rule 3745-114 ORC 3704.03(F)	See d)(6), d)(7), and d)(8)

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) control requirements for this emissions unit has been determined to be compliance with the terms and conditions of this

permit and the use of a dust collector that is capable of achieving 0.02 grain PM10/dscf.

b. All emissions of particulate matter are PM10.

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

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

e. OAC rule 3745-21-07(G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

It should be noted that on February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC), and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. However, the rule rescindment and new rule have not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP).

f. The permittee shall comply with the applicable standards required for operations at existing facilities pursuant to 40 CFR Part 63, Subpart WWWW, as stated in 63.5805(b). Per this regulation, this emissions unit shall meet the requirements stated in Table 4 to Subpart WWWW of Part 63 - Work Practice Standards, Items #6, #7, and #8 - For all mixing or BMC manufacturing operations.

g. Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the process baghouse during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the process baghouse on daily basis.

[OAC rule 3745-77-07(C)(1) and PTI #03-17003]

(2) Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the

investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

[OAC rule 3745-77-07(C)(1) and PTI #03-17003]

(3) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop reading immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[OAC rule 3745-77-07(C)(1) and PTI #03-17003]

(4) The acceptable range for the pressure drop across the baghouse is 4 to 6 inches of water.

[OAC rule 3745-77-07(C)(1) and PTI #03-17003]

(5) This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into the Title V permit for the facility by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1) and PTI #03-17003]

(6) The Permit to Install for this emissions unit P027 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (g/m3): 85,202

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

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

MAGLC (g/m3): 2,028

* This is the potential to emit of OC based on lbs OC/batch and the amount of batches run in one hour. All OC emissions are considered styrene as worst-case.

[OAC rule 3745-77-07(C)(1) and PTI #03-16038]

(7) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

[OAC rule 3745-77-07(C)(1) and PTI #03-16038]

(8) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[OAC rule 3745-77-07(C)(1) and PTI #03-16038]

e) Reporting Requirements

(1) The permittee shall submit quarterly reports in accordance with the Standard Terms and Conditions of this permit that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;

b. an identification of each incident of deviation described in a. where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in a. where proper records were not maintained for the investigation and/or the corrective action.

[OAC rule 3745-77-07(C)(1) and PTI #03-17003]

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

a. Pursuant to 40 CFR Part 63.5860(a), this emissions unit shall meet the requirements stated in Table 9 to Subpart WWWW of Part 63 - Initial Compliance with Work Practice Standards, Item #6, #7, and #8 - For existing mixing or BMC manufacturing operations.

b. Pursuant to 40 CFR Part 63.5905(a), this emissions unit shall meet the requirements in Table 13 to Subpart WWWW of Part 63 - Applicability and Timing of Notifications, Item 1 - If your facility is an existing source subject to this subpart.

c. Pursuant to 40 CFR Part 63.5910(a), (b), (g), and (h), this emissions unit shall meet the requirements in Table 14 to Subpart WWWW of Part 63 - Requirements for Reports, Items 1 and 2, for compliance reports and an immediate startup, shutdown, and malfunction report.

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

f) Testing Requirements

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

a. Emissions Limitations:

0.02 grain PM10/dscf; 1.49 tons PM10/yr

Applicable Compliance Method:

The 0.02 grain PM10/dscf emission limitation was established in accordance with the baghouse manufacturer's guaranteed, maximum outlet grain loading. If required, compliance with the particulate emissions limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 201 and 202. Alternative U.S.EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

The annual limitation was established by multiplying the maximum outlet concentration from the baghouse (0.02 grain PM10/dscf) by the maximum volumetric air flow (1980 dscfm), 60 minutes/hour, and a maximum operating schedule of 8760 hours/year, and then dividing by 7000 grains/pound and 2000 pounds/ton. Therefore, provided compliance is demonstrated with the maximum outlet concentration, compliance with the annual limitation will be assumed.

[OAC rule 3745-77-07(C)(1) and PTI #03-17003]

b. Emissions Limitations:

1.67 lbs OC/hour and 7.30 tons OC/year

Applicable Compliance Method:

The hourly emissions limitation represents the potential to emit* for this emissions unit and was established by multiplying the company supplied emissions factor of 0.25 pound OC/batch by the maximum operating scenarios of 53.3 batches/shift and 1 shift/8 hours. If required, the permittee shall demonstrate compliance with the hourly emissions limitation by testing in accordance with Methods 1 – 4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A. The permittee shall construct a temporary enclosure around this emissions unit during the test to capture any emissions which are not vented through the baghouse stack.

The annual limitation was established by multiplying the hourly emissions limit by a maximum operating schedule of 8,760 hours/year and dividing by 2000 pounds/ton. Therefore, provided compliance is demonstrated with the maximum outlet concentration, compliance with the annual limitation will be assumed.

[OAC rule 3745-77-07(C)(1) and PTI #03-17003]

c. Emissions Limitation:

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

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17003]

g) Miscellaneous Requirements

(1) None.

11. P028, Extruder(s) 9A/9B

Operations, Property and/or Equipment Description:

Extruder(s) used to form bulk molding compounds manufactured in Mixer #9.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-16038, issued 02-27-2007)	1.67 pounds organic compounds (OC)/hour; 7.30 tons OC/year
b.	OAC rule 3745-21-07(G)	none [See b)(2)a.]

(2) Additional Terms and Conditions

a. OAC rule 3745-21-07(G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

It should be noted that on February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC), and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. However, the rule rescindment and new rule have not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

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

a. Emissions Limitation:

1.67 pounds OC/hour and 7.30 tons OC/year

Applicable Compliance Method:

The hourly and annual emission limitations are based on the emission unit's potential to emit*. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limitations.

*The hourly potential to emit for this emissions unit is based on testing of similar operations. If required, compliance with the hourly limitation shall be determined in accordance with the test methods and procedures of 40 CFR Part 60, Appendix A, Methods 1-4, and 204 through 204F of 40 CFR Part 51, Appendix M.

The annual potential to emit for this emissions unit is based on the hourly emissions multiplied by a maximum operating schedule of 8,760 hours/year and then divided by 2000 pounds/ton.

[OAC rule 3745-77-07(C)(1) and PTI #03-16038]

g) Miscellaneous Requirements

(1) None.

12. P029, 75 gallon Mixer

Operations, Property and/or Equipment Description:

75 gallon mixer, weigh out hopper, filler holding tank, 2 resin day tanks, 2 drum stations, minors weigh out station, and conveying

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-17003, issued 01-17-2006)	0.02 grain particulate matter of 10 microns or less (PM10) per dscf, 1.49 tons PM10 per year [See b)(2)a. and b)(2)b.] 7.30 tons organic compounds (OC) per year [See b)(2)c.] Visible PE shall not exceed 0% opacity, as a six-minute average.
b.	OAC rule 3745-17-11(B)	none [See b)(2)d.]
c.	OAC rule 3745-17-07(A)	none [See b)(2)e.]
d.	OAC rule 3745-21-07(G)	none [See b)(2)f.]
e.	40 CFR Part 63, Subpart WWWW [In accordance with 40 CFR Part 63.5795(b) and 63.5935, this emissions unit is a mixer at an existing BMC manufacturing facility, subject to the work practice standards specified in this section.]	See b)(2)g.
f.	40 CFR 63.1 - 15 (40 CFR 63.5925)	See b)(2)h.

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) control requirements for this emissions unit has been determined to be compliance with the terms and conditions of this

permit and the use of a dust collector that is capable of achieving 0.02 grain PM10/dscf.

b. All emissions of particulate matter are PM10.

c. The emissions limitation of 7.30 tons OC/year is based on an assigned emissions factor of 0.25 lbs OC/batch of polystyrene resin mixed, and recordkeeping to show no more than 160 batches of polystyrene mixed per day.

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

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

f. OAC rule 3745-21-07(G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

It should be noted that on February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC), and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. However, the rule rescindment and new rule have not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP).

g. The permittee shall comply with the applicable standards required for operations at existing facilities pursuant to 40 CFR Part 63, Subpart WWWW, as stated in 63.5805(b). Per this regulation, this emissions unit shall meet the requirements stated in Table 4 to Subpart WWWW of Part 63 - Work Practice Standards, Items #6, #7, and #8 - For all mixing or BMC manufacturing operations.

h. Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the process baghouse during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the process baghouse on daily basis.

[OAC rule 3745-77-07(C)(1) and PTI #03-17003]

(2) Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

[OAC rule 3745-77-07(C)(1) and PTI #03-17003]

(3) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop reading immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[OAC rule 3745-77-07(C)(1) and PTI #03-17003]

(4) The acceptable range for the pressure drop across the baghouse is 4 to 6 inches of water.

[OAC rule 3745-77-07(C)(1) and PTI #03-17003]

(5) This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into the Title V permit for the facility by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1) and PTI #03-17003]

(6) The permittee shall maintain monthly records of the following, for this emissions unit:

a. the company identification of each type of bulk molding compound mixed;

b. the number of batches mixed;

c. the total OC emissions rate for mixing operations, in pounds per month, using the established emission factor of 0.25 pound OC/batch or as derived from the most recent stack test on this emissions unit or similar mixer, calculated as follows:

(batches of material mixed) X (0.25 pound OC/batch) = pounds OC/month; and

d. the annual OC emissions rate for mixing operations in tons per year [summation of d)(6)c. multiplied by a conversion factor of 1 ton/2000 lbs., for each calendar month to date from January to December].

[OAC rule 3745-77-07(C)(1) and PTI #03-17003]

e) Reporting Requirements

(1) The permittee shall submit quarterly reports in accordance with the Standard Terms and Conditions of this permit that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;

b. an identification of each incident of deviation described in a. where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in a. where proper records were not maintained for the investigation and/or the corrective action.

[OAC rule 3745-77-07(C)(1) and PTI #03-17003]

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

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

a. Pursuant to 40 CFR Part 63.5860(a), this emissions unit shall meet the requirements stated in Table 9 to Subpart WWWW of Part 63 - Initial Compliance with Work Practice Standards, Item #6, #7, and #8 - For existing mixing or BMC manufacturing operations.

b. Pursuant to 40 CFR Part 63.5905(a), this emissions unit shall meet the requirements in Table 13 to Subpart WWWW of Part 63 - Applicability and Timing of Notifications, Item 1 - If your facility is an existing source subject to this subpart.

c. Pursuant to 40 CFR Part 63.5910(a), (b), (g), and (h), this emissions unit shall meet the requirements in Table 14 to Subpart WWWW of Part 63 - Requirements for Reports, Items 1 and 2, for compliance reports and an immediate startup, shutdown, and malfunction report.

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

f) Testing Requirements

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

a. Emissions Limitations:

0.02 grain PM10/dscf; 1.49 tons PM10/yr

Applicable Compliance Method:

The 0.02 grain PM10/dscf emissions limitation represents the potential to emit* for this emissions unit. Therefore no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit was established in accordance with the maximum outlet grain loading concentration for the baghouse. If required, compliance with the particulate emissions limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 201 and 202. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

The annual limitation was established by multiplying the maximum outlet concentration from the baghouse (0.02 grain PM10/dscf) by the maximum volumetric air flow (1980 dscfm), 60 minutes/hour, and a maximum operating schedule of 8760 hours/year, and then dividing by 7000 grains/pound and 2000 pounds/ton. Therefore, provided compliance is demonstrated with the maximum outlet concentration, compliance with the annual limitation will be assumed.

[OAC rule 3745-77-07(C)(1) and PTI #03-17003]

b. Emissions Limitations:

7.30 tons organic compounds (OC) per year

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section d)(6) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17003]

c. Emissions Limitation:

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

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17003]

g) Miscellaneous Requirements

(1) None.

13. P030, Mixer 1

Operations, Property and/or Equipment Description:

75 gallon mixer, weigh out hopper, filler holding tank, 2 resin day tanks, 2 drum stations, dries holding tank, minors weigh out station, and one conveyor

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F) (PTI #03-17241, issued 02-27-2007)	0.02 grain particulate matter 10 microns or less in size (PM10) per dry standard cubic foot (dscf) 1.49 tons PM10/year Visible particulate emissions (PE) shall not exceed 0% opacity, as a 6-minute average. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)c.
c.	OAC rule 3745-17-11(B)	none [See b)(2)d.]
d.	OAC rule 3745-17-07(A)	none [See b)(2)e.]
e.	OAC rule 3745-21-07(G)	none [See b)(2)f.]
f.	40 CFR Part 63, Subpart WWWW [In accordance with 40 CFR Part 63.5795(b) and 63.5935, this emissions unit is a mixer at an existing BMC manufacturing facility, subject to the work practice standards specified in this section.]	See b)(2)g.
g.	40 CFR 63.1 - 15 (40 CFR 63.5925)	See b)(2)h.

(2) Additional Terms and Conditions

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

b. All particulate matter emissions are PM10.

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

The potential to emit for this emissions unit is 7.31 tons of VOC per year based a maximum hourly emission rate of 1.67 lbs per hour (as determined by the stack test data of a similar source), a maximum operating schedule of 8760 hours per year.

d. The mass emission limitation specified by this rule is less stringent than the mass emission limitation established pursuant to OAC rule 3745-31-02 (A)(2).

e. The visible PE limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-02 (A)(2).

f. OAC rule 3745-21-07(G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

It should be noted that on February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC), and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. However, the rule rescindment and new rule have not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP).

g. The permittee shall comply with the applicable standards required for operations at existing facilities pursuant to 40 CFR Part 63, Subpart WWWW, as stated in 63.5805(b). Per this regulation, this emissions unit shall meet the requirements stated in Table 4 to Subpart WWWW of Part 63 - Work Practice Standards, Items #6, #7, and #8 - For all mixing or BMC manufacturing operations.

h. Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

[OAC rule 3745-77-07(C)(1) and PTI #03-17241]

(2) Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

[OAC rule 3745-77-07(C)(1) and PTI #03-17241]

(3) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop reading immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[OAC rule 3745-77-07(C)(1) and PTI #03-17241]

(4) The acceptable range for the pressure drop across the baghouse is 1 to 6 inches of water.

[OAC rule 3745-77-07(C)(1) and PTI #03-17241]

(5) This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the ranges will not constitute a modification or relaxation of the monitoring requirements of this permit and may be incorporated into the Title V permit for the facility by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1) and PTI #03-17241].

e) Reporting Requirements

(1) The permittee shall submit quarterly reports in accordance with the Standard Terms and Conditions of this permit that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pressure drop across the baghouse was outside of the acceptable range;

b. an identification of each incident of deviation described in a. where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in a. where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1) and PTI #03-17241]

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

a. Pursuant to 40 CFR Part 63.5860(a), this emissions unit shall meet the requirements stated in Table 9 to Subpart WWWW of Part 63 - Initial Compliance with Work Practice Standards, Item #6, #7, and #8 - For existing mixing or BMC manufacturing operations.

b. Pursuant to 40 CFR Part 63.5905(a), this emissions unit shall meet the requirements in Table 13 to Subpart WWWW of Part 63 - Applicability and Timing of Notifications, Item 1 - If your facility is an existing source subject to this subpart.

c. Pursuant to 40 CFR Part 63.5910(a), (b), (g), and (h), this emissions unit shall meet the requirements in Table 14 to Subpart WWWW of Part 63 - Requirements for Reports, Items 1 and 2, for compliance reports and an immediate startup, shutdown, and malfunction report.

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

f) Testing Requirements

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

a. Emissions Limitation:

0.02 grain PM10/dscf

Applicable Compliance Method:

This emissions limitation was established in accordance with the maximum outlet grain loading concentration for the baghouse. If required, compliance with the particulate emissions limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 201 and 202. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

[OAC rule 3745-77-07(C)(1) and PTI #03-17241]

b. Emissions Limitation:

1.49 tons PM10/yr

Applicable Compliance Method:

The annual limitation was established by multiplying the maximum baghouse outlet concentration of 0.02 gr/dscf by the maximum volumetric air flow rate (1980 dscfm) contributed from this emissions unit to the baghouse, and then by the following conversion factors in order to covert to tons per year: (1 lb/7000 grains x 60 minutes/hour x 8760 hours/year x 1 ton/2000 lbs). Therefore, provided compliance is demonstrated with the 0.02 gr PE/dscf limitation, compliance with the annual limitation shall be assumed.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17241]

c. Emission Limitation:

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

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17241]

g) Miscellaneous Requirements

(1) This emissions unit has replaced emission units P001.

14. P031, Mixer 2

Operations, Property and/or Equipment Description:

75 gallon mixer, weigh out hopper, 2 resin day tanks, 2 drum stations, dries holding tank, minors weigh out station and one conveyor.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F) (PTI #03-17241, issued 02-27-2007)	0.02 grain particulate matter 10 microns or less in size (PM10) per dry standard cubic foot (dscf) 1.49 tons PM10/year Visible particulate emissions (PE) shall not exceed 0% opacity, as a 6-minute average. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)c.
	OAC rule 3745-17-11(B)	none [See b)(2)d.]
	OAC rule 3745-17-07(A)	none [See b)(2)e.]
	OAC rule 3745-21-07(G)	none [See b)(2)f.]
	40 CFR Part 63, Subpart WWWW [In accordance with 40 CFR Part 63.5795(b) and 63.5935, this emissions unit is a mixer at an existing BMC manufacturing facility, subject to the work practice standards specified in this section.]	See b)(2)g.
	40 CFR 63.1 - 15 (40 CFR 63.5925)	See b)(2)h.

(2) Additional Terms and Conditions

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

b. All particulate matter emissions are PM10.

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

The potential to emit for this emissions unit is 7.31 tons of VOC per year based a maximum hourly emission rate of 1.67 lbs per hour (as determined by the stack test data of a similar source), a maximum operating schedule of 8760 hours per year.

d. The mass emission limitation specified by this rule is less stringent than the mass emission limitation established pursuant to OAC rule 3745-31-02 (A)(2).

e. The visible PE limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-02 (A)(2).

f. OAC rule 3745-21-07(G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

It should be noted that on February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC), and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. However, the rule rescindment and new rule have not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP).

g. The permittee shall comply with the applicable standards required for operations at existing facilities pursuant to 40 CFR Part 63 Subpart WWWW as stated in 63.5805(b). Per this regulation, this emissions unit shall meet the requirements stated in Table 4 to Subpart WWWW of Part 63 - Work Practice Standards, Items #6, #7, and #8 - For all mixing or BMC manufacturing operations.

h. Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

[OAC rule 3745-77-07(C)(1) and PTI #03-17241]

(2) Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

[OAC rule 3745-77-07(C)(1) and PTI #03-17241]

(3) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop reading immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[OAC rule 3745-77-07(C)(1) and PTI #03-17241]

(4) The acceptable range for the pressure drop across the baghouse is 1 to 6 inches of water.

[OAC rule 3745-77-07(C)(1) and PTI #03-17241]

(5) This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the ranges will not constitute a modification or relaxation of the monitoring requirements of this permit and may be incorporated into the Title V permit for the facility by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1) and PTI #03-17241].

e) Reporting Requirements

(1) The permittee shall submit quarterly reports in accordance with the Standard Terms and Conditions of this permit that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pressure drop across the baghouse was outside of the acceptable range;

b. an identification of each incident of deviation described in a. where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in a. where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1) and PTI #03-17241]

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

a. Pursuant to 40 CFR Part 63.5860(a), this emissions unit shall meet the requirements stated in Table 9 to Subpart WWWW of Part 63 - Initial Compliance with Work Practice Standards, Item #6, #7, and #8 - For existing mixing or BMC manufacturing operations.

b. Pursuant to 40 CFR Part 63.5905(a), this emissions unit shall meet the requirements in Table 13 to Subpart WWWW of Part 63 - Applicability and Timing of Notifications, Item 1 - If your facility is an existing source subject to this subpart.

c. Pursuant to 40 CFR Part 63.5910(a), (b), (g), and (h), this emissions unit shall meet the requirements in Table 14 to Subpart WWWW of Part 63 - Requirements for Reports, Items 1 and 2, for compliance reports and an immediate startup, shutdown, and malfunction report.

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

f) Testing Requirements

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

(2)

a. Emissions Limitation:

0.02 grain PM10/dscf

Applicable Compliance Method:

This emissions limitation was established in accordance with the maximum outlet grain loading concentration for the baghouse. If required, compliance with the particulate emissions limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 201 and 202. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

[OAC rule 3745-77-07(C)(1) and PTI #03-17241]

b. Emissions Limitation:

1.49 tons PM10/yr

Applicable Compliance Method:

The annual limitation was established by multiplying the maximum baghouse outlet concentration of 0.02 gr/dscf by the maximum volumetric air flow rate (1980 dscfm) contributed from this emissions unit to the baghouse, and then by the following conversion factors in order to convert to tons per year: (1 lb/7000 grains x 60 minutes/hour x 8760 hours/year x 1 ton/2000 lbs). Therefore, provided compliance is demonstrated with the 0.02 gr PE/dscf limitation compliance with the annual limitation shall be assumed.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17241]

c. Emission Limitation:

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

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17241].

g) Miscellaneous Requirements

(1) This emissions unit has replaced emission units P021.