



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

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P.O. Box 1049
Columbus, OH 43216-1049

12/19/2008

TONY GIANCOLA
GMR TECHNOLOGY INC
2131 AETNA RD
ASHTABULA, OH 44004

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0204010490
Permit Number: P0104165
Permit Type: Initial Installation
County: Ashtabula

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Star Beacon. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control 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 draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA-NEDO; Pennsylvania; Canada

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

GMR Technologies manufactures small SMC/BMC parts. They have closed mold presses to do this. GMR wishes to remain a state facility and avoid being subject to the MACT, subpart WWWW. To accomplish this, the facility has requested federally enforceable limits. These limits are based on the PTE. Below is a summary of the facility's allowable emissions. All emissions are VOC/HAP as all emissions are styrene or MME.

PTI	EU	ALLOWABLE in tons/year
02-22463	P001	0.04
02-22463	P002	0.08
02-22463	P003	0.08
02-22463	P004	0.33
02-22463	P005	0.14
02-22463	P006	0.15
02-22463	P007	0.08
02-22463	P008	0.31
02-22463	P009	0.31
02-22463	P010	0.77
02-22463	P011	0.46
02-22463	P012	0.31
02-22463	P013	0.93
02-22463	P014	0.23
02-22463	P015	0.23
02-22463	P016	0.31
02-22862	P017	0.23
02-22863	P018	0.23
02-22943	P019	0.79
TOTAL	P001-P019	6.01
P0104165	P020	0.31
P0104165	P021	0.53
P0104165	P022	0.16
P0104165	P023	0.16
P0104165	P024	0.08
NEW FACILITY TOTAL	P001-P024	7.25

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
GMR TECHNOLOGY INC

Issue Date: 12/19/2008
Permit Number: P0104165
Permit Type: Initial Installation
Permit Description: P020-P024, 5 new presses
Facility ID: 0204010490
Facility Location: GMR TECHNOLOGY INC
2131 AETNA RD,
ASHTABULA, OH 44004
Facility Description: All Other Plastics Product Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Bridget Byrne at Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road or (330)425-9171. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

DRAFT

**Air Pollution Permit-to-Install and Operate
for
GMR TECHNOLOGY INC**

Facility ID: 0204010490
Permit Number: P0104165
Permit Type: Initial Installation
Issued: 12/19/2008
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



Air Pollution Permit-to-Install and Operate
for
GMR TECHNOLOGY INC

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104165

Facility ID: 0204010490

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0204010490
Application Number(s): A0036438
Permit Number: P0104165
Permit Description: P020-P024, 5 new presses
Permit Type: Initial Installation
Permit Fee: \$1,000.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 12/19/2008
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

GMR TECHNOLOGY INC
2131 AETNA RD
ASHTABULA, OH 44004

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0104165
Permit Description: P020-P024, 5 new presses

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

- Emissions Unit ID:** P020
Company Equipment ID: Press I-7
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID:** P021
Company Equipment ID: mold machine
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID:** P024
Company Equipment ID: press 26
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Group Name: P022 and P023

Emissions Unit ID:	P022
Company Equipment ID:	press 24
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P023
Company Equipment ID:	Press 25
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104165

Facility ID: 0204010490

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104165

Facility ID: 0204010490

Effective Date: To be entered upon final issuance

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104165

Facility ID: 0204010490

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104165

Facility ID: 0204010490

Effective Date: To be entered upon final issuance

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104165

Facility ID: 0204010490

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P020, Press I-7

Operations, Property and/or Equipment Description:

Polyester injection mold press

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a, b)(2)a, c)(1), c)(2), d)(1), d)(2), e)(1), e)(2) and f)(1)

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(D)(1)(b)	<p>Volatile organic compounds / hazardous air pollutants (VOC/HAP) emissions shall not exceed 51.8 pounds per month and 0.31 ton per year.</p> <p>See sections b)(2)a, c)(1) and c)(2).</p>

(2) Additional Terms and Conditions

a. The permittee has voluntarily accepted the operational restrictions in sections c)(1) and c)(2).

c) Operational Restrictions

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



closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.

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

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 mold compound employed;
 - b. the number of pounds of each mold compound employed;
 - c. the percent, by weight, of VOC/HAP in each mold compound employed; and
 - d. the available VOC/HAP from each mold compound employed, calculated as (b x c) for each mold compound employed.
- (2) The permittee shall conduct daily inspections of this emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in section c)(1) and shall include the following information:
 - a. whether the emissions unit was in operation;
 - b. whether the permittee uncovered, unwrapped or exposed more than one charge per mold cycle per compression/injection molding machine as specified in section c)(1); and
 - c. information on the duration and cause of each deviation and the corrective action taken.

e) Reporting Requirements

- (1) The permittee shall submit written quarterly deviation (excursion) reports. The quarterly reports shall include:
 - a. an identification of each month during which the monthly VOC/HAP emissions exceeded 51.8 pounds, and the actual monthly VOC/HAP emissions for each such month; and
 - b. an identification of any day the permittee uncovered, unwrapped or exposed more than one charge per mold cycle per compression/injection molding machine.
- (2) If no deviations occurred during any such calendar quarter, a report indicating no deviations shall be sent.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date



identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the allowable emission limitations in section b)(1)a of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC/HAP emissions shall not exceed 51.8 pounds per month.

Applicable Compliance Method:

Compliance shall be calculated as the summation of the monthly VOC/HAP emissions for all mold compounds employed. The emissions for each mold compound shall be calculated as follows:

$$\text{lbs VOC/HAP per month} = P \times 2.0\%$$

where:

P = available VOC/HAP, in pounds per month, as recorded in section d)(1)d.; and
2.0 % = an emission factor based upon AP-24, Table 4.4-2 "Emission Factors for Uncontrolled Polyester Resin Product Fabrication Processes" (02/07).

b. Emission Limitation:

VOC/HAP emissions shall not exceed 0.31 ton per year.

Applicable Compliance Method:

Compliance shall be demonstrated by the summation of the monthly emissions calculated in section f)(1)a for the calendar year, and then dividing by 2000 lbs/ton.

g) Miscellaneous Requirements

(1) None.



2. P021, mold machine

Operations, Property and/or Equipment Description:

Injection mold machine I-8

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a, b)(2)a, c)(1), c)(2), d)(1), d)(2), e)(1), e)(2) and f)(1)

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(D)(1)(b)	<p>Volatile organic compounds / hazardous air pollutants (VOC/HAP) emissions shall not exceed 87.6 pounds per month and 0.53 ton per year.</p> <p>See sections b)(2)a, c)(1) and c)(2).</p>

(2) Additional Terms and Conditions

a. The permittee has voluntarily accepted the operational restrictions in sections c)(1) and c)(2).

c) Operational Restrictions

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



closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.

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

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 mold compound employed;
 - b. the number of pounds of each mold compound employed;
 - c. the percent, by weight, of VOC/HAP in each mold compound employed; and
 - d. the available VOC/HAP from each mold compound employed, calculated as (b x c) for each mold compound employed.
- (2) The permittee shall conduct daily inspections of this emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in section c)(1) and shall include the following information:
 - a. whether the emissions unit was in operation;
 - b. whether the permittee uncovered, unwrapped or exposed more than one charge per mold cycle per compression/injection molding machine as specified in section c)(1); and
 - c. information on the duration and cause of each deviation and the corrective action taken.

e) Reporting Requirements

- (1) The permittee shall submit written quarterly deviation (excursion) reports. The quarterly reports shall include:
 - a. an identification of each month during which the monthly VOC/HAP emissions exceeded 87.6 pounds, and the actual monthly VOC/HAP emissions for each such month; and
 - b. an identification of any day the permittee uncovered, unwrapped or exposed more than one charge per mold cycle per compression/injection molding machine.
- (2) If no deviations occurred during any such calendar quarter, a report indicating no deviations shall be sent.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date



identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the allowable emission limitations in section b)(1)a of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC/HAP emissions shall not exceed 87.6 pounds per month.

Applicable Compliance Method:

Compliance shall be calculated as the summation of the monthly VOC/HAP emissions for all mold compounds employed. The emissions for each mold compound shall be calculated as follows:

$$\text{lbs VOC/HAP per month} = P \times 2.0\%$$

where:

P = available VOC/HAP, in pounds per month, as recorded in section d)(1)d.; and 2.0 % = an emission factor based upon AP-24, Table 4.4-2 "Emission Factors for Uncontrolled Polyester Resin Product Fabrication Processes" (02/07).

b. Emission Limitation:

VOC/HAP emissions shall not exceed 0.53 ton per year.

Applicable Compliance Method:

Compliance shall be demonstrated by the summation of the monthly emissions calculated in section f)(1)a for the calendar year, and then dividing by 2000 lbs/ton.

g) Miscellaneous Requirements

(1) None.



3. P024, press 26

Operations, Property and/or Equipment Description:

press with changeable molds

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a, b)(2)a, c)(1), c)(2), d)(1), d)(2), e)(1), e)(2) and f)(1)

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(D)(1)(b)	<p>Volatile organic compounds / hazardous air pollutants (VOC/HAP) emissions shall not exceed 12.9 pounds per month and 0.08 ton per year.</p> <p>See sections b)(2)a, c)(1) and c)(2).</p>

(2) Additional Terms and Conditions

a. The permittee has voluntarily accepted the operational restrictions in sections c)(1) and c)(2).

c) Operational Restrictions

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



closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.

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

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 mold compound employed;
 - b. the number of pounds of each mold compound employed;
 - c. the percent, by weight, of VOC/HAP in each mold compound employed; and
 - d. the available VOC/HAP from each mold compound employed, calculated as (b x c) for each mold compound employed.
- (2) The permittee shall conduct daily inspections of this emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in section c)(1) and shall include the following information:
 - a. whether the emissions unit was in operation;
 - b. whether the permittee uncovered, unwrapped or exposed more than one charge per mold cycle per compression/injection molding machine as specified in section c)(1); and
 - c. information on the duration and cause of each deviation and the corrective action taken.

e) Reporting Requirements

- (1) The permittee shall submit written quarterly deviation (excursion) reports. The quarterly reports shall include:
 - a. an identification of each month during which the monthly VOC/HAP emissions exceeded 12.9 pounds, and the actual monthly VOC/HAP emissions for each such month; and
 - b. an identification of any day the permittee uncovered, unwrapped or exposed more than one charge per mold cycle per compression/injection molding machine.
- (2) If no deviations occurred during any such calendar quarter, a report indicating no deviations shall be sent.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date



identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the allowable emission limitations in section b)(1)a of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC/HAP emissions shall not exceed 12.9 pounds per month.

Applicable Compliance Method:

Compliance shall be calculated as the summation of the monthly VOC/HAP emissions for all mold compounds employed. The emissions for each mold compound shall be calculated as follows:

$$\text{lbs VOC/HAP per month} = P \times 2.0\%$$

where:

P = available VOC/HAP, in pounds per month, as recorded in section d)(1)d.; and
2.0 % = an emission factor based upon AP-24, Table 4.4-2 "Emission Factors for Uncontrolled Polyester Resin Product Fabrication Processes" (02/07).

b. Emission Limitation:

VOC/HAP emissions shall not exceed 0.08 ton per year.

Applicable Compliance Method:

Compliance shall be demonstrated by the summation of the monthly emissions calculated in section f)(1)a for the calendar year, and then dividing by 2000 lbs/ton.

g) Miscellaneous Requirements

(1) None.



4. Emissions Unit Group - P022 and P023: P022, P023,

EU ID	Operations, Property and/or Equipment Description
P022	press with changeable molds
P023	press with changeable molds

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a, b)(2)a, c)(1), c)(2), d)(1), d)(2), e)(1), e)(2) and f)(1)

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(D)(1)(b)	Volatile organic compounds / hazardous air pollutants (VOC/HAP) emissions shall not exceed 25.8 pounds per month and 0.16 ton per year. See sections b)(2)a, c)(1) and c)(2).

(2) Additional Terms and Conditions

a. The permittee has voluntarily accepted the operational restrictions in sections c)(1) and c)(2).

c) Operational Restrictions

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



closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.

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

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 mold compound employed;
 - b. the number of pounds of each mold compound employed;
 - c. the percent, by weight, of VOC/HAP in each mold compound employed; and
 - d. the available VOC/HAP from each mold compound employed, calculated as (b x c) for each mold compound employed.
- (2) The permittee shall conduct daily inspections of this emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in section c)(1) and shall include the following information:
 - a. whether the emissions unit was in operation;
 - b. whether the permittee uncovered, unwrapped or exposed more than one charge per mold cycle per compression/injection molding machine as specified in section c)(1); and
 - c. information on the duration and cause of each deviation and the corrective action taken.

e) Reporting Requirements

- (1) The permittee shall submit written quarterly deviation (excursion) reports. The quarterly reports shall include:
 - a. an identification of each month during which the monthly VOC/HAP emissions exceeded 25.8 pounds, and the actual monthly VOC/HAP emissions for each such month; and
 - b. an identification of any day the permittee uncovered, unwrapped or exposed more than one charge per mold cycle per compression/injection molding machine.
- (2) If no deviations occurred during any such calendar quarter, a report indicating no deviations shall be sent.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date



identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the allowable emission limitations in section b)(1)a of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC/HAP emissions shall not exceed 25.8 pounds per month.

Applicable Compliance Method:

Compliance shall be calculated as the summation of the monthly VOC/HAP emissions for all mold compounds employed. The emissions for each mold compound shall be calculated as follows:

$$\text{lbs VOC/HAP per month} = P \times 2.0\%$$

where:

P = available VOC/HAP, in pounds per month, as recorded in section d)(1)d.; and 2.0 % = an emission factor based upon AP-24, Table 4.4-2 "Emission Factors for Uncontrolled Polyester Resin Product Fabrication Processes" (02/07).

b. Emission Limitation:

VOC/HAP emissions shall not exceed 0.16 ton per year.

Applicable Compliance Method:

Compliance shall be demonstrated by the summation of the monthly emissions calculated in section f)(1)a for the calendar year, and then dividing by 2000 lbs/ton.

g) Miscellaneous Requirements

(1) None.