



State of Ohio Environmental Protection Agency

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Columbus, Ohio 43215

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

3/9/2009

Certified Mail

Ron Clark
Allied Moulded Products, Inc.
222 N. Union Street
P.O. BOX 587
Bryan, OH 43506

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0386010104
Permit Number: 03-17421
Permit Type: OAC Chapter 3745-31 Modification
County: Williams

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install 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 public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Bryan Times. A copy of the public notice and the draft permit are enclosed. 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 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, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install 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 is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

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

Cc: U.S. EPA
Ohio EPA-NWDO; Michigan; Indiana

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

PUBLIC NOTICE
Issuance Of Draft Air Pollution Permit-To-Install
Allied Moulded Products, Inc.

Issue Date: 3/9/2009

Permit Number: 03-17421

Permit Type: OAC Chapter 3745-31 Modification

Permit Description: Mixing operations (Modification to PTI 03-9601 issued on 05/08/96 to establish federally enforceable limits and administrative modification to same permit to allow for reduction in permit allowables. Also, modification to PTI 03-14074 to establish federally enforceable limits and to allow for increase in permit allowables).

Facility ID: 0386010104

Facility Location: Allied Moulded Products, Inc.
222 N. Union Street, P.O. BOX 587
Bryan, OH 43506

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 permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. 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 Donald Waltermeyer at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road or (419)352-8461. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

This permit is a modification to PTI 03-9601, issued on May 8, 1996 and to PTI 03-14074, issued on November 28, 2003 to establish federally enforceable limits and also to administratively modify the permits to allow for the reduction in permit allowable for multiple bulk mold compound mixers at Allied Moulded Products.

3. Facility Emissions and Attainment Status:

The facility has requested synthetic minor limitations to better balance their current permits and provide additional room between their current potential to emit volatile organic compounds and the 250 tons/yr threshold for PSD. The volatile organic compound (VOC) emissions from emissions units P004 through P006 and P048 shall not exceed 62.5 tons per year combined based on a rolling, 12-month summation of monthly emissions. The federally enforceable VOC limitations are based on styrene usage and styrene content restrictions.

4. Source Emissions:

Federally enforceable VOC limitations based on styrene usage and styrene content restrictions included in this permit will result in a limitation of 62.5 tons per year combined based on a rolling, 12-month summation of monthly emissions for emission units P004 through P006 and P048 combined.

5. Conclusion:

Based on the rolling, 12-month summation of the monthly styrene usage and styrene content restrictions contained in this permit, the facility will continue to be a "minor" source for PSD purposes.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	62.5
PE	0.24



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

DRAFT

**Air Pollution Permit-to-Install
for
Allied Moulded Products, Inc.**

Facility ID: 0386010104
Permit Number: 03-17421
Permit Type: OAC Chapter 3745-31 Modification
Issued: 3/9/2009
Effective: To be entered upon final issuance



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Air Pollution Permit-to-Install
 for
 Allied Moulded Products, Inc.

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 03-17421

Facility ID: 0386010104

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0386010104

Facility Description: Plastics Products

Application Number(s): A0005036

Permit Number: 03-17421

Permit Description: Mixing operations (Modification to PTI 03-9601 issued on 05/08/96 to establish federally enforceable limits and administrative modification to same permit to allow for reduction in permit allowables. Also, modification to PTI 03-14074 to establish federally enforceable limits and to allow for increase in permit allowables).

Permit Type: OAC Chapter 3745-31 Modification

Permit Fee: \$3,000.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 3/9/2009

Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Allied Moulded Products, Inc.
222 N. Union Street
P.O. BOX 587
Bryan, OH 43506

of a Permit-to-Install 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, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 03-17421

Facility ID: 0386010104

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: 03-17421

Permit Description: Mixing operations (Modification to PTI 03-9601 issued on 05/08/96 to establish federally enforceable limits and administrative modification to same permit to allow for reduction in permit allowables. Also, modification to PTI 03-14074 to establish federally enforceable limits and to allow for increase in permit allowables).

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

Emissions Unit ID:	P005
Company Equipment ID:	High Shear Blender #6066
Superseded Permit Number:	03-9409
General Permit Category and Type:	Not Applicable

Group Name: 5550 lbs/hr BMC Mixers

Emissions Unit ID:	P004
Company Equipment ID:	Mixer Asset #472
Superseded Permit Number:	03-9409
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	Mixer Asset #471
Superseded Permit Number:	03-9409
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P048
Company Equipment ID:	Mixer Asset #1867
Superseded Permit Number:	03-14074
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 03-17421

Facility ID: 0386010104

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

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

2. Severability Clause

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

3. General Requirements

- a) 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 re-issuance, or modification.



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

4. Monitoring and Related Record Keeping and Reporting Requirements

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



(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

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

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



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

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted



(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.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.



No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

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

14. Public Disclosure

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

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

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

16. Fees

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 03-17421

Facility ID: 0386010104

Effective Date: To be entered upon final issuance

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 03-17421

Facility ID: 0386010104

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

Permit Number: 03-17421

Facility ID: 0386010104

Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.

2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastics Composites Production: P004-P006 & P048. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA, Northwest District Office.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 03-17421

Facility ID: 0386010104

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P005, High Shear Blender #6066

Operations, Property and/or Equipment Description:

7000 lbs/hr High Shear Blender #6066 (Modification to PTI 03-9601 issued on 05/08/96 to establish federally enforceable limits and administrative modification to same permit to allow for reduction in permit allowables).

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)(a)	151.20 lbs volatile organic compound (VOC)/day & 27.59 tons VOC/yr 0.02 lb particulate emissions (PE)/hr & 0.09 ton PE/yr Visible PE shall not exceed 20% opacity, as a six-minute average See b)(2)a.
b.	OAC rule 3745-31-05(D)	62.5 tons VOC per rolling, 12-month period for emissions units P004 through P006 & P048, combined See b)(2)b. & c)(1)
c.	OAC rule 3745-17-11(B)	None [See b)(2)c.]
d.	OAC rule 3745-17-07(A)	None [See b)(2)d.]
e.	OAC rule 3745-21-07(G)(2)	None [See b)(2)e.]
f.	40 CFR Part 63, Subpart WWWW	40 CFR 63.5805 Table 4 to Subpart WWWW of 40 CFR Part 63 [See b)(2)f.] See section B.2. - FACILITY-WIDE TERMS AND CONDITIONS



(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the use of a baghouse with a 99.7% control efficiency and compliance with the terms and conditions of this permit.

[Note: The requirement to re-evaluate BAT under OAC rule 3745-31-05(A)(3)(b) does not apply to emissions unit P005 because the emissions unit was installed prior to August 3, 2006. Emissions unit P005 is not undergoing a physical change or change in the method of operation that would be considered a modification. Emissions unit P005 is included in this permit to install as part of an administrative modification to establish emissions limitations consistent with the physical capacity of the unit and to establish federally enforceable emissions limitations for VOC for emissions units P004 through P006 & P048 combined [See b)(2).b.].

- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD) regulations:

i. 62.5 tons VOC per rolling, 12-month period based on material usage restrictions for emission units P004 through P006 & P048, combined [See c)(1)].

- c. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Williams County.

- d. This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

- e. OAC Rule 3745-21-07(G)(2) does not apply to this emissions unit 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).

[Note: On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 which includes OAC rule 3745-21-07(G)(2) 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. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves the revision to Ohio's State Implementation Plan (SIP)].

- f. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart WWWW, including the following sections:

63.5780 through 63.5935



c) Operational Restrictions

- (1) The maximum annual styrene usage for emissions units P004 through P006 & P048, combined, shall not exceed 5000 tons.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the styrene usage levels specified in the following table:

Calendar Month(s)	Maximum Allowable Styrene Usage (in tons)
1-1	1250
1-2	1591
1-3	1932
1-4	2273
1-5	2614
1-6	2955
1-7	3296
1-8	3637
1-9	3978
1-10	4319
1-11	4460
1-12	5000

After the first 12-months of operation following the issuance of this permit, compliance with the annual styrene usage limitation shall be based upon a rolling, 12-month summation of the monthly styrene usage rates.

- (2) The maximum resin styrene content shall not exceed 7.2%, by weight.
- (3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart WWWW, including the following sections:
63.5780 through 63.5935

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification for each bulk molding compound formulation mixed;
 - b. the number of pounds of each bulk molding compound formulation mixed;
 - c. the VOC (styrene) content (in percent by, weight) for each bulk molding compound formulation mixed;



- d. the total VOC emission rate for all bulk molding compounds mixed, in pounds, calculated as follows:

$$\text{VOC emissions (lbs/day)} = \text{summation of } [(P_i \times S_i \times EF)] \text{ for } i = 1 \text{ to } n$$

where:

$$i = 1, 2, \dots, n$$

n = the total number of different types of bulk molding compounds

P_i = the number of pounds per day of bulk molding compound i mixed

S_i = the VOC (styrene) content (in percent, by weight) for bulk molding compound i mixed

EF = .0125 = volatilization emission factor for styrene* (1.25 percent, by weight, of the total styrene employed)

* This emission factor is based on information supplied by the permittee.

- e. the annual year-to-date VOC emissions from all bulk molding compounds mixed, in tons (sum of d)(1)d. for each calendar day to date from January to December times 1 ton/2000 lbs).

- (2) The permittee shall collect and record the following information each month for emissions units P004 through P006 & P048, combined:

- a. the company identification for each bulk molding compound formulation mixed;
- b. the number of pounds of each bulk molding compound formulation mixed;
- c. the VOC (styrene) content (in percent by, weight) for each bulk molding compound formulation mixed;
- d. for the first 12 months of operation, the cumulative monthly emission rate of VOC, from all bulk molding compound formulations mixed, in lbs/month, calculated as follows:

$$\text{VOC emissions (lbs/month)} = \text{summation of } [(P_i \times S_i \times EF)] \text{ for } i = 1 \text{ to } n$$

where:

$$i = 1, 2, \dots, n$$

n = the total number of different types of bulk molding compounds

P_i = the number of pounds per month of bulk molding compound i mixed

S_i = the VOC (styrene) content (in percent, by weight) for bulk molding compound i mixed



EF = .0125 = volatilization emission factor for styrene* (1.25 percent, by weight, of the total styrene employed)

* This emission factor is based on information supplied by the permittee.

- e. for the first 12 months of operation, the annual VOC emissions, in tons from all bulk mold compound formulations mixed;
 - f. beginning the first month after the first 12 months of operation under the provisions of this permit, the annual VOC emissions, in tons from all bulk mold compound formulations mixed, based upon a rolling, 12-month summation;
 - g. for the first 12 months of operation, the cumulative styrene usage, in tons; and
 - h. beginning the first month after the first 12 calendar months of operation under the provisions of this permit, the annual styrene usage, in tons, based upon a rolling, 12-month summation.
- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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

63.5780 through 63.5935



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. any exceedances of the 151.20 lbs VOC/day emission limit in section b)(1)a. of this permit;
 - ii. any exceedances of the 62.5 tons VOC/rolling, 12-month period for emissions units P004 through P006 & P048 combined;
 - iii. any exceedance of the maximum annual styrene usage rate of 5000 tons for emissions units P004 through P006 & P048 combined, based on a rolling, 12-month summation of monthly styrene usage; and
 - iv. any exceedance of the maximum resin styrene content in section c)(2) of this permit.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate 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.
- (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.

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

63.5780 through 63.5935

f) Testing Requirements

- (1) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation(s):
151.20 lbs VOC/day & 27.59 tons VOC/yr

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements specified in section d)(1) of this permit.

- b. Emission Limitation(s):
0.02 lb PE/hr & 0.09 ton PE/yr

Applicable Compliance Method:
The permittee may demonstrate compliance with the hourly PE limitation by using the following formula:

$$PE \text{ (lb/hr)} = [P \times D \times E \times (1 - C)]$$

where:

P = maximum process weight rate, in lbs/hr (7000 lbs/hr)

D = dry filler content of BMC, in percent by weight

E = 0.0012 = emission factor (0.12 percent, by weight, of the amount of solids mixed)*

C = operating control efficiency of the baghouse (99.7 percent)

* emission factor is based on a company study of the dust collected in the mix room

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is shown, compliance with the annual limitation shall be assumed.



- c. Emission Limitation(s):
62.5 tons VOC per rolling, 12-month period for emissions units P004 through P006 & P048, combined

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements specified in section d)(2) of this permit.

- d. Emission Limitation:
The maximum annual styrene usage for emissions units P004 through P006 & P048 combined shall not exceed 5000 tons per year, based on a rolling, 12-month summation of the styrene usage.

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements specified in section d)(2) of this permit.

- e. Emission Limitation:
Visible PE shall not exceed 20% 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").

- f. Emission Limitation:
The maximum resin styrene content shall not exceed 7.2%, by weight.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section d)(2) of this permit.

- (2) Formulation data or USEPA Method 311 shall be used to determine the monomer (VOC) content of each BMC resin.
- (3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart WWWW, including the following sections:

63.5780 through 63.5935

g) Miscellaneous Requirements

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

63.5780 through 63.5935

- (2) The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install 03-9601 issued on May 8, 1996.



2. Emissions Unit Group - 5550 lbs/hr BMC Mixers: P004, P006, P048,

EU ID	Operations, Property and/or Equipment Description
P004	5550 lbs/hr BMC Mixer, Asset #472 (Modification to PTI 03-9601 issued on 05/08/96 to establish federally enforceable limits and administrative modification to same permit to allow for reduction in permit allowables).
P006	5550 lbs/hr BMC Mixer, Asset #471 Modification to PTI 03-9601 issued on 05/08/96 to establish federally enforceable limits and administrative modification to same permit to allow for reduction in permit allowables
P048	Bulk Molding Compound (BMC) Mixer - Asset 1867 (Modification to PTI 03-14074, issued on 11/28/03 to establish federally enforceable limits and administrative modification to same permit to allow for change in permit allowables).

- 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)(a)	119.88 lbs volatile organic compound (VOC)/day & 21.88 tons VOC/yr 0.01 lb particulate emission (PE)/hr & 0.05 ton PE/yr Visible PE shall not exceed 20% opacity, as a six-minute average. See b)(2)a.
b.	OAC rule 3745-31-05(D)	62.5 tons VOC/rolling, 12-month period for emissions units P004 through P006 & P048, combined See b)(2)b. & c)(1)
c.	OAC rule 3745-17-11(B)	None [See b)(2)c.]
d.	OAC rule 3745-17-07(A)	None [See b)(2)d.]
e.	OAC rule 3745-21-07(G) (2)	None [See b)(2)e.]



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	40 CFR Part 63, Subpart WWWW 40 CFR Part 63, Subpart WWWW continued	63.5805 Table 4 to Subpart WWWW of 40 CFR Part 63 [See b)(2)f.] See section B.2. - FACILITY-WIDE TERMS AND CONDITIONS

(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the use of a baghouse with a 99.7% control efficiency and compliance with the terms and conditions of this permit.

[Note: The exception to reevaluate BAT under OAC rule 3745-31-05 (A) (3) (b) does not apply to emissions units P004, P006, & P048 because these emissions units were installed prior to August 3, 2006. Emissions unit P004, P006, & P048 are not undergoing a physical change or change in the method of operation that would be considered a modification. Emissions units P004, P006, & P048 are included in this permit to install as part of an administrative modification to establish emissions limitations consistent with the physical capacity of the unit and to establish federally enforceable emissions limitations for VOC for emissions units P004 through P006 & P048 combined (See b)(2).b.).

- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD) regulations:
 - i. 62.5 tons VOC per rolling, 12-month period based on material usage restrictions for emission units P004 through P006 & P048, combined [See c)(1)].
- c. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Williams County.
- d. This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- e. OAC Rule 3745-21-07 (G)(2) does not apply to this emissions unit 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).

[Note: On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 which includes OAC rule 3745-21-07 (G) (2) 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. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves the revision to Ohio's State Implementation Plan (SIP)].

- f. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart WWWW, including the following sections:

63.5780 through 63.5935

c) Operational Restrictions

- (1) The maximum annual styrene usage for emissions units P004 through P006 & P048, combined, shall not exceed 5000 tons.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the styrene usage levels specified in the following table:

Calendar Month(s)	Maximum Allowable Styrene Usage (in tons)
1-1	1250
1-2	1591
1-3	1932
1-4	2273
1-5	2614
1-6	2955
1-7	3296
1-8	3637
1-9	3978
1-10	4319
1-11	4460
1-12	5000

After the first 12-months of operation following the issuance of this permit, compliance with the annual styrene usage limitation shall be based upon a rolling, 12-month summation of the monthly styrene usage rates.

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

63.5780 through 63.5935

d) Monitoring and/or Recordkeeping Requirements

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



- a. the company identification for each bulk molding compound formulation mixed;
- b. the number of pounds of each bulk molding compound formulation mixed;
- c. the VOC (styrene) content (in percent by, weight) for each bulk molding compound formulation mixed;
- d. the total VOC emission rate for all bulk molding compounds mixed, in pounds, calculated as follows:

$$\text{VOC emissions (lbs/day)} = \text{summation of } [(P_i \times S_i \times EF)] \text{ for } i = 1 \text{ to } n$$

where:

$$i = 1, 2, \dots, n$$

n = the total number of different types of bulk molding compounds

P_i = the number of pounds per day of bulk molding compound i mixed

S_i = the VOC (styrene) content (in percent, by weight) for bulk molding compound i mixed

$EF = .0125$ = volatilization emission factor for styrene* (1.25 percent, by weight, of the total styrene employed)

* This emission factor is based on information supplied by the permittee.

- e. the annual year-to-date VOC emissions from all bulk molding compounds mixed, in tons (sum of A.III.1.d. for each calendar day to date from January to December times 1 ton/2000 lbs).

(2) The permittee shall collect and record the following information each month for emissions units P004 through P006 & P048, combined:

- a. the company identification for each bulk molding compound formulation mixed;
- b. the number of pounds of each bulk molding compound formulation mixed;
- c. the VOC (styrene) content (in percent by, weight) for each bulk molding compound formulation mixed;
- d. for the first 12 months of operation, the cumulative monthly emission rate of VOC, from all bulk molding compound formulations mixed, in lbs/month, calculated as follows:

$$\text{VOC emissions (lbs/month)} = \text{summation of } [(P_i \times S_i \times EF)] \text{ for } i = 1 \text{ to } n$$

where:

$$i = 1, 2, \dots, n$$



n = the total number of different types of bulk molding compounds

Pi = the number of pounds per month of bulk molding compound i mixed

Si = the VOC (styrene) content (in percent, by weight) for bulk molding compound i mixed

EF = .0125 = volatilization emission factor for styrene* (1.25 percent, by weight, of the total styrene employed)

* This emission factor is based on information supplied by the permittee.

- e. for the first 12 months of operation, the annual VOC emissions, in tons from all bulk mold compound formulations mixed;
 - f. beginning the first month after the first 12 months of operation under the provisions of this permit, the annual VOC emissions, in tons from all bulk mold compound formulations mixed, based upon a rolling, 12-month summation;
 - g. for the first 12 months of operation, the cumulative styrene usage, in tons; and
 - h. beginning the first month after the first 12 calendar months of operation under the provisions of this permit, the annual styrene usage, in tons, based upon a rolling, 12-month summation.
- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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



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

63.5780 through 63.5935

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. any exceedances of the 119.88 lbs VOC/day emission limit in section b)(1)a. of this permit;

ii. any exceedances of the 62.5 tons VOC/rolling, 12-month period for emissions units P004 through P006 & P048 combined; and

iii. any exceedance of the maximum annual styrene usage rate of 5000 tons for emissions units P004 through P006 & P048 combined, based on a rolling, 12-month summation of monthly styrene usage.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate 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.

- (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.

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

63.5780 through 63.5935

f) Testing Requirements

- (1) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation(s):
119.88 lbs VOC/day & 21.88 tons VOC/yr

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in section d)(1) of this permit.

- b. Emission Limitation(s):
0.01 lb PE/hr & 0.05 ton PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by using the following formula:

$$PE \text{ (lb/hr)} = [P \times D \times E \times (1 - C)]$$

where:

P = maximum process weight rate, in lbs/hr (5550 lbs/hr)

D = dry filler content of BMC, in percent by weight

E = 0.0012 = emission factor (0.12 percent, by weight, of the amount of solids mixed)*

C = operating control efficiency of the baghouse (99.7 percent)

* emission factor is based on a company study of the dust collected in the mix room

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and the dividing by 2000. Therefore, as long as compliance with the hourly limitation is shown, compliance with the annual limitation shall be assumed.



- c. Emission Limitation(s):
62.5 tons VOC/rolling, 12-month period for emissions units P004 through P006 & P048

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements specified in section d)(2) of this permit.

- d. Emission Limitation:
The maximum annual styrene usage for emissions units P004 through P006 & P048 combined shall not exceed 5000 tons per year, based on a rolling, 12-month summation of the styrene usage.

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements specified in section d)(2) of this permit.

- e. Emission Limitation:
Visible PE shall not exceed 20% 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").

- (2) Formulation data or USEPA Method 311 shall be used to determine the monomer (VOC) content of each BMC resin.

- (3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart WWWW, including the following sections:
63.5780 through 63.5935

g) Miscellaneous Requirements

- (1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart WWWW, including the following sections:
63.5780 through 63.5935

- (2) The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install 03-9601 issued on May 8, 1996