



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

3/31/2009

Certified Mail

Matthew Narducci  
Molded Fiber Glass Companies, Plant 2  
2925 MFG Place  
Box 675  
Ashtabula, OH 44004

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0204010230  
Permit Number: P0104435  
Permit Type: Administrative Modification  
County: Ashtabula

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northeast District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc>.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification  
Ohio EPA DAPC, Northeast District Office

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





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

**FINAL**

**Air Pollution Permit-to-Install  
for  
Molded Fiber Glass Companies, Plant 2**

Facility ID: 0204010230  
Permit Number: P0104435  
Permit Type: Administrative Modification  
Issued: 3/31/2009  
Effective: 3/31/2009





State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Air Pollution Permit-to-Install**  
 for  
 Molded Fiber Glass Companies, Plant 2

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104435  
**Facility ID:** 0204010230  
**Effective Date:** 3/31/2009

# Authorization

Facility ID: 0204010230  
Facility Description: Reinforced plastic composite products manufacturing  
Application Number(s): M0000384  
Permit Number: P0104435  
Permit Description: Administrative modification to reduce the allowable emissions of VOC based upon actual emissions testing  
Permit Type: Administrative Modification  
Permit Fee: \$300.00  
Issue Date: 3/31/2009  
Effective Date: 3/31/2009

This document constitutes issuance to:

Molded Fiber Glass Companies, Plant 2  
2925 MFG Place  
Box 675  
Ashtabula, OH 44004

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

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



## Authorization (continued)

Permit Number: P0104435  
 Permit Description: Administrative modification to reduce the allowable emissions of VOC based upon actual emissions testing

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

**Group Name: Mixers**

<b>Emissions Unit ID:</b>	<b>P043</b>
Company Equipment ID:	Mixer 6
Superseded Permit Number:	02-21169
General Permit Category and	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>P044</b>
Company Equipment ID:	Mixer 7
Superseded Permit Number:	02-21169
General Permit Category and	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>P045</b>
Company Equipment ID:	Mixer 8
Superseded Permit Number:	02-21169
General Permit Category and	Not Applicable
Type:	



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104435  
**Facility ID:** 0204010230  
**Effective Date:** 3/31/2009

## **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, Northeast District Office.



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

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

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

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

## 5. **Scheduled Maintenance/Malfunction Reporting**

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

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

## 6. **Compliance Requirements**

a) 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, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

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

## **8. Air Pollution Nuisance**

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

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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



(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

**Final Permit-to-Install**  
**Permit Number:** P0104435  
**Facility ID:** 0204010230  
**Effective Date:** 3/31/2009

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northeast 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

**Final Permit-to-Install**  
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## **B. Facility-Wide Terms and Conditions**



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

a) None.

2. MACT Subpart WWWW and Subpart A Requirements

a) Applicable Emissions Limitations and/or Control Requirements

(1) The following emissions units contained in this permit are subject to MACT Subpart WWWW as an existing affected source: P043, P044, and P045. The complete MACT requirements have been established in the Title V permit for this facility which will encompass these emissions units upon reissuance. The applicable sections of the MACT Subpart WWWW have been cited in the appropriate sections for the emissions units subject to this rule.

b) Operational Restrictions

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

a.	63.5790	affected sources
		Compliance standards and work practices in Table 4: 3. a new or existing materials HAP-containing materials storage operation; 6. all mixing or BMC manufacturing operations; 7. all mixing or BMC manufacturing operations; and
b.	63.5805(b)	8. all mixing or BMC manufacturing operations.
c.	63.5835	general requirements for compliance
d.	63.5925	applicable General Provisions in Table 15

c) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart WWWW, including the following sections:

a.	63.5840	date of initial compliance demonstration
b.	63.5860(a)	method for demonstrating initial compliance
c.	63.5900(a)(4)	continuous compliance for work practices



d.	63.5915(a)	keeping records for notifications and reports
e.	63.5915(d)	certified statement for work practice requirements
f.	63.5920	record retention and format requirements

d) Reporting Requirements

- (1) The permittee shall submit semiannual reports and such other notifications and reports to the Ohio EPA, Northeast District Office as are required pursuant to 40 CFR Part 63, Subpart WWW, per the following sections:

a	63.5900(b)	reporting deviations
b.	63.5905(a)	submit all notification in Table 13
c.	63.5905(b)	procedure if information in any notification changes
d.	63.5910(a)	submit all reports in Table 14
e.	63.5910(b)	schedule for submission of reports
f.	63.5910(c)	information required in each compliance report
g.	63.5910(d)	information required in each deviation report
h.	63.5910(g)	semi-annual deviation report requirements for source that has obtained a Title V operating permit



State of Ohio Environmental Protection Agency  
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**Final Permit-to-Install**  
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## **C. Emissions Unit Terms and Conditions**



1. **Emissions Unit Group - Mixers: P043, P044, P045,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P043	Cowles Mixer Number 6 polyester resin/styrene paste production with a baghouse to control particulate emissions.
P044	Cowles Mixer number 7 for polyester resin/styrene paste production with a baghouse to control particulate emissions.
P045	Cowles mixer number 8 for polyester resin/styrene paste production with a baghouse to control particulate emissions.

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.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3)	<p><u>For emissions units P043, P044 and P045, combined:</u>            Particulate emissions (PE) shall not exceed 0.35 lb/hr and 1.53 tons/year from the dust collector exhaust. See b)(2)a.</p> <p>Visible particulate emissions shall not exceed 5% opacity as a 6-minute average from the dust collector exhaust.</p> <p><u>For emissions units P043, P044 and P045, individually:</u>            Organic compound (OC) emissions shall not exceed 0.96 lb/hr, and 4.2 tons/year from production operations.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR Parts 63.5780 - 63.5935.</p>
b.	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation required pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(A)	The visible particulate emission limitation required by this applicable rule is less



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		stringent than the visible particulate emission limitation required pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 63, Subpart WWWW  [In accordance with 40 CFR 63.5795(b), these emission units are mixers at an existing reinforced plastic composites production facility subject to the emission limitations and control measures specified in this section and section B.]	See d)(1), d)(3) and B.2.

(2) Additional Terms and Conditions

- a. Each emissions unit shall be vented to a baghouse shared with emissions units P039, P040, P043, P044, P045 and P046 for control of particulate emissions from polyester resin/styrene paste production. Each emissions unit shall not be operated without the baghouse control, except as required by 40 CFR 63.5805(b).

c) Operational Restrictions

- (1) The pressure drop across the baghouse shall be maintained within the range recommended by the manufacturer while the emissions unit is in operation or within a range established during the most recent performance test that demonstrated that the emissions unit was in compliance.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in each section, the permittee shall perform inspections of production operations associated with each emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practices are employed to minimize HAP emissions. The inspections shall be performed during representative, normal operating conditions and a record of the inspection shall be maintained in an operations log.
- (2) The permittee shall collect and record the following information for each day for each emissions unit separately:
  - a. the company identification for each resin/styrene paste material produced in the mixer;
  - b. the weight of each OC-containing material added to the mixer, in pounds per day;
  - c. the total OC content of each OC-containing material added to the mixer, in percent by weight;



- d. the sum of the OC emissions from each OC-containing material applied in this emissions unit, in pounds per day calculated according to the equation in f)(1)d;
  - e. the actual number of hours that the emissions unit was in operation; and
  - f. the average hourly OC emissions rate for all polyester resin/styrene paste produced; i.e., d. divided by e., in pounds per hour (average).
- (3) The permittee shall collect and record the following information for each day of operation:
- a. the date and reason any required inspection was not performed; and
  - b. any dates on which the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.
- (4) The permittee shall maintain information to document the composition of each OC-containing material applied and each polyester resin/styrene paste material produced in this emissions unit.
- (5) The permittee shall properly operate and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports which include the following information:
- a. an identification of each day during which the average hourly OC emissions from the production operations exceeded 0.96 pound per hour, and the actual average hourly OC emissions for each such day; and
  - b. an identification of each day during which the pressure drop across the baghouse did not comply with the allowable range specified in c)(1).
- The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (2) The permittee shall submit annual reports which specify the total OC emissions and the total PE rate from each emissions unit for the previous calendar year. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 of each year.
- f) Testing Requirements
- (1) Compliance with the allowable emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:



a. Emission Limitation:

Visible particulate emissions shall not exceed 5% opacity as a 6-minute average from the dust collector exhaust.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

For emissions units P043, P044 and P045, combined, PE shall not exceed 0.35 lb/hr from the dust collector exhaust.

Applicable Compliance Method:

To determine the potential worst case emission rate for particulate matter, the following equation may be used:

$$E_{PE} = P \times EF \times (1 - CE/100)$$

where:

$E_{PE}$  = particulate emissions, in pounds per hour;

$P$  = maximum dry solids throughput rate, 8,680 pounds per hour;

$EF$  = emission factor for uncontrolled PE, which is 0.01 pound of uncontrolled PE per pound of dry solids processed for a semi-covered or covered mixer, per AP-42, Chapter 6.4 (5/83); and

$CE$  = control efficiency of the PE control device, 99.9%.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emission Limitation:

For emissions units P043, P044 and P045, combined, PE shall not exceed 1.53 tons/year from the dust collector exhaust.

Applicable Compliance Method:

Compliance shall be demonstrated with the annual emission limitation for PE, by multiplying the worst case hourly emission rate, as determined in f)(1)b, by the actual hours of operation, as recorded in the record keeping requirements of d)(2)e, and dividing by 2000 lbs/ton.



d. Emission Limitation:

For emissions units P043, P044 and P045, individually, OC emissions shall not exceed 0.96 lb/hr from production operations.

Applicable Compliance Method:

Compliance shall be demonstrated in d)(2)f and through the record keeping maintained in d)(2) and the calculation below:

E\_OC=

$$\sum_{n=1}^n (PWR \times S \times EF)$$

where:

E\_OC = OC emissions in pounds per day;

PWR = weight of each OC containing material, in pounds per day;

S = percent of available styrene of OC containing material; and

EF = 0.00095 pound VOC/OC emissions per pound of available VOC/OC, the emission factor developed during the 6/19/07 US EPA method 204F and method 25A tests on emissions unit P045, a polyester resin/styrene mixer no. 8.

If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by the Ohio EPA.

e. Emission Limitation:

For emissions units P043, P044 and P045, individually, OC emissions shall not exceed 4.2 tons/year from production operations.

Applicable Compliance Method:

Compliance shall be based on the sum of the daily OC emission rates from the production operations, E\_OC, as recorded in d)(2), for the calendar year, and divided by 2,000 pounds/ton.

- (2) Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104435  
**Facility ID:** 0204010230  
**Effective Date:** 3/31/2009

- (3) The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).
- g) Miscellaneous Requirements
  - (1) The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emission unit contained in permit to install 02-21169 as issued on December 29, 2005.