



State of Ohio Environmental Protection Agency

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9/23/2009

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

Certified Mail  
Facility ID: 0386010104  
Permit Number: P0087821  
County: Williams

RE: DRAFT AIR POLLUTION TITLE V PERMIT  
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Bryan Times. A copy of the public notice, the Statement of Basis, 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 permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
50 W. Town St., 7<sup>th</sup> Floor  
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 processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. 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 Region 5 - *Via E-Mail Notification*  
Ohio EPA-NWDO; Michigan; Indiana

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



PUBLIC NOTICE  
ISSUANCE OF DRAFT AIR POLLUTION Title V Permit  
Allied Moulded Products, Inc.

Issue Date: 9/23/2009  
Permit Number: P0087821  
Permit Type: Renewal  
Permit Description: Renewal Title V Permit for a Plastics Products Facility  
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 Title V operating permit for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Donald Waltermeyer at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road or (419)352-8461. The permit, which includes a detailed description of the operations, and associated statement of basis for the permit requirements, can be downloaded from the Web page: [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc)





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Division of Air Pollution Control

Title V Permit Statement of Basis  
Permit Number: P0087821  
Facility ID: 0386010104

## Statement of Basis For Air Pollution Title V Permit

Facility ID:	0386010104
Facility Name:	Allied Moulded Products, Inc.
Facility Description:	Plastics Products
Facility Address:	222 N. Union Street, Bryan, OH 43506
Permit #:	P0087821, Renewal
This facility is subject to Title V because it is major for: <input type="checkbox"/> Lead <input type="checkbox"/> Sulfur Dioxide <input type="checkbox"/> Carbon Monoxide <input checked="" type="checkbox"/> Volatile Organic Compounds <input type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> Particulate Matter ≤ 10 microns <input checked="" type="checkbox"/> Single Hazardous Air Pollutant <input type="checkbox"/> Combined Hazardous Air Pollutants <input checked="" type="checkbox"/> Maximum Available Control Technology Standard(s)	

### A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	YES
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	NO
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A



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Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	<p>PTI #03-16162 - Issued 8/24/04 for emission units P021, P033, P043 and P044 – To correct unit maximum capacities and BAT emissions limits</p> <p>PTI #03-17358 – Issued 1/10/08 for emission units P051 – P055 and R001 – Initial permit</p> <p>P0103671 – Issued 2/18/09 for emission units P022-P030, P049 and P050 – To revise emission limitations</p> <p>P0103638 – Issued 3/24/09 for emission units P009 – P016, P018 – P020, P032, P034, P035, P042 and P047 - To allow for an increase in emissions units' material throughput</p> <p>P0103672 – Issued 3/24/09 for emission unit P801 – Initial permit</p> <p>PTI #03-17421 - Issued 5/7/09 for emission units P004 – P006 and P048 - To establish federally enforceable limits and for an increase in emission limitations</p>

**B. Facility-Wide Terms and Conditions**

Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745- )	Other	
B.1			Lists Facility wide terms and conditions that are enforceable under state law only.
B.2	77-07(A)(13)	N	Lists insignificant emission units that have one or more applicable requirements.
B.3			Lists insignificant emission units that are “de minimis” or not subject to any applicable requirements.
B.4	N	40 CFR, Part 63, Subpart WWWW	States applicability of 40 CFR, Part 63, Subpart WWWW for the facility
B.5	N	40 CFR, Part 63, Subpart	States applicability of 40 CFR, Part 63, Subpart PPPP for the facility



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		PPPP	
B.6	N	40 CFR, Part 63, Subpart WWWW	States applicability of 40 CFR, Part 63, Subpart WWWW for T003 - T006 (insignificant emission units)

**C. Emissions Unit Terms and Conditions**

<p>Key:          EU = emissions unit ID          ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)          OR = operational restriction          M = monitoring requirements          St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement</p>															
<p>ENF = did noncompliance issues drive the monitoring requirements?          R = record keeping requirements          Rp = reporting requirements          ET = emission testing requirements (not including compliance method terms)          Misc = miscellaneous requirements</p>															
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745- )	Other												
P001 P003 P004 P005 P006 P048 P051 R001	Exempt	17-07(A)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-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.
P001 P003 P004 P005 P006 P048 P051 R001	Exempt	17-11(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-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.
P001	None	21-07(G)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-OAC rule 3745-21-07(G) is not applicable



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P003																because the facility is not located in a "Priority 1" county and the emissions unit was installed prior to February 15, 1972.
P004 P005 P006 P048 P051	None	21-07(G)(2)	N	Y	N	N	N	N	N	N	N	N	N	N	N	ND-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 <u>Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234</u> ).
P009 P010 P011 P012 P013 P014 P015 P016 P018 P019 P020 P021 P022 P023 P024 P025 P026 P027 P028 P028 P029 P030 P032 P033 P034 P035	None	21-07(G)	N	Y	N	N	N	N	N	N	N	N	N	N	N	ND-This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).



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P042 P043 P044 P047 P049 P050															
P052 P053 P054 P055	None	21-07(G)(2)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-The potential to emit for each of these emission units is less than the allowable emission limitation established by this rule.
P801	None	21-07(G)	N	Y	Y	Y	N	N	Y	N	Y	N	N	N	<p>OR-The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, is prohibited in this emissions unit.</p> <p>ND-On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirement to comply with OAC rule 3745-21-07 (G) still exists as part of the federally-approved SIP of Ohio.</p> <p>It should be noted that OAC rule 3745-21-07(G)(2) does not establish any requirements for this emissions unit due to the restriction prohibiting the use of photochemically reactive material [see c)(2)]. The restriction on the use of photochemically reactive material shall terminate on the date the U.S. EPA approves the rule rescindment and new rule as a revision of the Ohio SIP.</p>
R001	8 lbs OC/hr and 40 lbs	21-07(G)(2)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Compliance shall be based upon the record keeping requirements in this permit.





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															compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.
P005	151.20 lbs VOC/day and 27.59 tons VOC/yr	N	31-05(A)(3)(a)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Compliance shall be demonstrated based on the recordkeeping requirements specified in this permit.
P005	0.02 lb PE/hr and 0.09 ton PE/yr	N	31-05(A)(3)(a)	N	N	Y	N	N	Y	N	Y	N	N	N	<p>ET-The permittee may demonstrate compliance with the hourly PE limitation by using the following formula:</p> $PE \text{ (lb/hr)} = [P \times D \times E \times (1 - C)]$ <p>where:</p> <p>P = maximum process weight rate, in lbs/hr (7000 lbs/hr);</p> <p>D = dry filler content of BMC, in percent by weight;</p> <p>E = 0.0012 = emission factor (0.12 percent, by weight, of the amount of solids mixed)*; and</p> <p>C = operating control efficiency of the baghouse (99.7 percent).</p> <p>*emission factor is based on a company study of the dust collected in the mix room</p> <p>If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A.</p> <p>The tons/yr emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.02 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term</p>



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															allowable emission limitation, compliance shall also be shown with the annual emission limitation.
P004 P005 P006 P048	Visible PE shall not exceed 20% opacity, as a 6-minute average	N	31-05(A)(3)(a)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-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").
P004 P005 P006 P048	62.5 tons VOC per rolling, 12-month period for emissions units P004 through P006 and P048, combined	N	31-05(D)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The maximum annual styrene usage for emissions units P004 through P006 and P048, combined, shall not exceed 5000 tons. ET-Compliance shall be demonstrated based on the record keeping requirements specified in this permit.
P009 P014 P015 P016 P018 P019 P020 P042	None	N	31-05(A)(3)(a)(ii)	Y	N	N	N	N	N	N	N	N	N	N	ND-The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the volatile organic compounds (VOC) from this air contaminant source since the potential to emit for VOC is less than ten tons per year.  The potential to emit for this emissions unit is 2.93 tons per year and was determined by multiplying a maximum bulk mold compound (BMC) usage rate of 500 lbs/hr by a maximum VOC (styrene) content of 7.2% by an emission factor of 1.86%, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.



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P010 P011 P012 P013 P032	None	N	31-05(A)(3)(a)(ii)	Y	N	N	N	N	N	N	N	N	N	N	ND-The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the volatile organic compounds (VOC) from this air contaminant source since the potential to emit for VOC is less than ten tons per year.  The potential to emit for this emissions unit is 1.47 tons per year and was determined by multiplying a maximum bulk mold compound (BMC) usage rate of 250 lbs/hr by a maximum VOC (styrene) content of 7.2% by an emission factor of 1.86%, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.
P021	0.29 lb OC/hr and 1.28 tons OC/yr	N	31-05(A)(3)	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp and ET-The emission limitations are based on the emission unit's Potential to Emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.  *The potential to emit for this emissions unit is based on a maximum throughput of 262 lbs BMC per hour, multiplied by a maximum resin content of 0.20 lb resin per lb BMC (20%), then multiplied by a maximum resin styrene (OC monomer) content of 0.30 (30%), then multiplied by an emission factor of 0.0186 (1.86%) (emissions factor is based on a consolidation of information from the Society of the Plastics Industry (SPI) and other sources).  The annual allowable OC limitation was developed by multiplying the hourly limitation by 8760 and then dividing by 2000.
P022 P023 P024 P025 P026 P027 P028	32.14 lbs OC/day and 5.87 tons OC/yr	N	31-05(A)(3)(a)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Compliance shall be based on the record keeping requirements specified in this permit.



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P029 P030 P049 P050																
P033	0.15 lb OC/hr and 0.64 ton OC/yr	N	31-05(A)(3)	N	N	N	N	N	N	N	N	N	N	N	N	<p>M, R, Rp and ET-The emission limitations are based on the emission unit's potential to emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.</p> <p>*The potential to emit for this emissions unit is based on a maximum throughput of 109 lbs BMC per hour, multiplied by a maximum resin content of 0.24 lb resin per lb BMC (24%), then multiplied by a maximum resin styrene (OC monomer) content of 0.30 (30%), then multiplied by an emission factor of 0.0186 (1.86%) (the emissions factor is based on a consolidation of information from the Society of the Plastics Industry (SPI) and other sources).</p> <p>The annual allowable OC limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000.</p>
P034 P035	None	N	31-05(A)(3)(a)(ii)	Y	N	N	N	N	N	N	N	N	N	N	N	<p>ND-The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the volatile organic compounds (VOC) from this air contaminant source since the potential to emit for VOC is less than ten tons per year.</p> <p>The potential to emit for this emissions unit is 2.93 tons per year and was determined by multiplying a maximum bulk mold compound (BMC) usage rate of 500 lbs/hr by a maximum VOC (styrene) content of 7.2% by an emission factor of 1.86%, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.</p>
P043 P044	0.30 lb OC/hr and 1.32 tons	N	31-05(A)(3)	N	N	N	N	N	N	N	N	N	N	N	N	<p>M, R, Rp and ET-The emission limitations are based on the emission unit's potential to emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required</p>



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	OC/yr															to demonstrate compliance with this limitation.  *The potential to emit for this emissions unit is based on a maximum throughput of 225 lbs BMC per hour, multiplied by a maximum resin content of 0.24 lb resin per lb BMC (24%), then multiplied by a maximum resin styrene (OC monomer) content of 0.30 (30%), then multiplied by an emission factor of 0.0186 (1.86%) (the emissions factor is based on a consolidation of information from the Society of the Plastics Industry (SPI) and other sources).  The annual allowable OC limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000.
P047	None	N	31-05(A)(3)(a)(ii)	Y	N	Y	N	N	Y	N	Y	N	N	N	N	ND-The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the volatile organic compounds (VOC) from this air contaminant source since the potential to emit for VOC is less than ten tons per year.  The potential to emit for this emissions unit is 5.87 tons per year and was determined by multiplying a maximum bulk mold compound (BMC) usage rate of 1000 lbs/hr by a maximum VOC (styrene) content of 7.2% by an emission factor of 1.86%, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.
P051	3.00 lbs OC/hr and 13.14 tons OC/yr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	N	ET-The hourly emission limitation represents the potential to emit* of this emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.  *The potential to emit was based on the following: The maximum hourly pounds of resin mixed (1500 lbs/hr) x the maximum OC content by weight (0.40 lb OC/lb resin) x a company supplied OC emission factor of 0.0050 lb OC emitted/lb OC mixed.  If required, the permittee shall demonstrate



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															<p>compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.</p> <p>Compliance with the tons/yr limitation shall be based upon the record keeping requirements specified in Section d)(1) of this permit.</p>
P051	None	N	31-05(A)(3)(b)	Y	N	N	N	N	N	N	N	N	N	N	<p>ND-"The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A) (3) do not apply to the particulate emissions (PE) from this air contaminant source because the calculated annual emission rate for PE is less than ten tons per year.</p> <p>The potential to emit for this emissions unit is 2.63 tons per year and was determined by multiplying a maximum uncontrolled particulate emission to the baghouse of 0.6 lb PE/hr, by 8760 hrs/yr and dividing by 2000 lbs/ton. It should be noted that emissions unit P051 is vented to a baghouse as an additional measure to prevent any industrial hygiene or housekeeping issues. The use of the baghouse is not included in the potential to emit calculations.</p>
P052 P053	None	N	31-05(A)(3)(b)	Y	N	N	N	N	N	N	N	N	N	N	<p>ND-The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3) do not apply to organic compounds from this air contaminant source since the uncontrolled potential to emit for organic compounds is less than ten tons per year.</p> <p>The potential to emit for each of these emissions units is 2.98 tons OC per year and was determined by multiplying a maximum resin paste usage rate of 168 lbs/hr x 0.286 lb OC/lb resin paste employed x an emission factor of 0.01 lb OC/lb OC applied + a maximum mold release usage rate of 0.20 lb/hr x 1 lb OC/lb mold release employed x an emission factor of 1 lb OC/lb mold release applied, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.</p>
P054	None	N	31-05(A)(3)(b)	Y	N	N	N	N	N	N	N	N	N	N	ND-The Best Available Technology (BAT)



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P055																requirements under OAC rule 3745-31-05 (A) (3) do not apply to organic compounds from these air contaminant sources since the uncontrolled potential to emit for organic compounds is less than ten tons per year.  The potential to emit for these emissions units is 1.49 tons OC per year and was determined by multiplying a maximum emission rate of 0.34 lb OC/hr by a maximum operating rate of 8760 hrs/yr and dividing 2000 lbs/ton.
P801	1815 lbs OC/month and 10.89 tons OC/yr	N	31-05(A)(3)(a)	N	N	Y	N	N	Y	N	Y	N	N	N		ET-Compliance shall be based on the recordkeeping in this permit.
R001	None	N	31-05(A)(3)(b)	Y	N	N	N	N	N	N	N	N	N	N		ND-The "Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A) (3) do not apply to the particulate emissions (PE) from this air contaminant source because the calculated annual emission rate for PE is less than ten tons per year.  The potential to emit for PE from the gelcoat spray booth is negligible and has not been quantified to establish a potential to emit value for this emissions unit.  "The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A) (3) do not apply to the organic compound emissions from this air contaminant source since the calculated annual emissions rate for organic compounds is less than ten tons per year taking into account the federally enforceable rule limit of 40 lbs organic compound per day under OAC rule 3745-21-07(G)(2).
P001 P003 P004 P005 P006 P009	See Rule	N	40 CFR, Part 63, Subpart WWWW	N	N	Y	N	N	Y	N	Y	N	Y	N		





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P801 R001																
P054 P055	See Rule	N	40 CFR, Part 63, Subpart PPPP	N	N	Y	N	N	Y	N	Y	N	Y	N		





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**DRAFT**

**Air Pollution Title V Permit**  
for  
**Allied Moulded Products, Inc.**

Facility ID: 0386010104  
Permit Number: P0087821  
Permit Type: Renewal  
Issued: 9/23/2009  
Effective: To be entered upon final issuance  
Expiration: To be entered upon final issuance





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**Air Pollution Title V Permit**  
 for  
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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Title V Permit**

**Permit Number:** P0087821

**Facility ID:** 0386010104

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0386010104

Facility Description: Plastics Products

Application Number(s): A0018889, A0018890, A0018891, A0018892, A0038062

Permit Number: P0087821

Permit Description: Renewal Title V Permit for a Plastics Products Facility

Permit Type: Renewal

Issue Date: 9/23/2009

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Superseded Permit Number:

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

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

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

Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Title V Permit**

**Permit Number:** P0087821

**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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
  - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
  - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
  - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations  
*(Authority for term: ORC 3704.036(A))*

**2. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*
- c) The permittee shall submit required reports in the following manner:
  - (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:



Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.



These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.



If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

- (4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northwest District Office.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

### **3. Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

### **4. Risk Management Plans**

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

### **5. Title IV Provisions**

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

*(Authority for term: OAC rule 3745-77-07(A)(5))*



**6. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.  
*(Authority for term: OAC rule 3745-77-07(A)(6))*

**7. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
  - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or



(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

**8. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

**9. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

**10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**11. Reopening for Cause**

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

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate



statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.  
*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

## **12. Federal and State Enforceability**

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

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

## **13. Compliance Requirements**

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.



d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

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

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

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

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

#### **14. Permit Shield**

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

#### **15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the



Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

**16. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

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

**17. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

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

**18. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the



permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.  
*(This term is provided for informational purposes only.)*

**19. Insignificant Activities or Emissions Levels**

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.  
*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.  
*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.  
*(Authority for term: OAC rule 3745-77-07(A)(1))*

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

**23. Title VI Provisions**

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



- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.  
*(Authority for term: OAC rule 3745-77-01(H)(11))*

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

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### **25. Records Retention Requirements Under State Law Only**

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

#### **26. Inspections and Information Requests**

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



EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

**27. Scheduled Maintenance/Malfunction Reporting**

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

**28. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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

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

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

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

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c) where the company's responsible official has certified that an emissions unit has been permanently shut down.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Title V Permit**

**Permit Number:** P0087821

**Facility ID:** 0386010104

**Effective Date:** To be entered upon final issuance

## **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) 3.
2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirement contained in a permit-to-install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18 and 3745-21 and 40 CFR, Part 63, Subpart WWWW:
  - a) T003 – Styrene resin tank #7480
  - b) T004 – Styrene resin tank #7481
  - c) T005 – Styrene resin tank #6716
  - d) T006 – Styrene resin tank #6717

[OAC rule 3745-77-07(A)(13)]
3. The following insignificant emissions units are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:
  - a) B001 – 100,000 Btu/hr natural gas fired heater #6861
  - b) B002 – 200,000 Btu/hr natural gas fired heater #6862
  - c) B003 – 200,000 Btu/nr natural gas fired heater #6863
  - d) B004 – 150,000 Btu/hr natural gas fired heater #6864
  - e) B005 – 150,000 Btu/hr natural gas fired heater #6865
  - f) B006 – 125,000 Btu/hr natural gas fired heater #6866
  - g) B007 – 100,000 Btu/hr natural gas fired heater #6867
  - h) B008 – 100,000 Btu/hr natural gas fired heater #6868
4. 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 Plastic Composites Production: P001, P003-P006, P009-P016, P018-P030, P032-P035, P042-P044, P047-P055, P801, R001 and T003-T006. 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.  

[40 CFR, Part 63, Subpart WWWW]
5. The following emissions units contained in this permit are subject to 40 CFR, Part 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: P054 and P055. 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.

[40 CFR, Part 63, Subpart PPPP]

6. The permittee shall comply with the applicable requirements under 40 CFR, Part 63, Subpart WWWW, including the following sections, for the following insignificant emission units T003 through T006:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.
63.5805(b)	The permittee shall comply with the applicable standards required for all operations at existing facilities not listed in 63.5805(a) pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #3 for new or existing materials HAP-containing material storage operations.
63.5835(a) and (c)	General compliance requirements
63.5840	Testing and Initial Compliance Requirements – By what date must I conduct a performance test or other initial compliance demonstration?
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #3 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements
63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (g) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]
63.5915(a) and (d)	Records that must be kept
63.5920(a) – (d)	In what form and for how long records must be kept
63.5925	Table 15 of Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1-15 apply

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Title V Permit**

**Permit Number:** P0087821

**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:**

High shear mixer for blending pre-mix slurry.

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) (PTI #03-17421, issued 5/7/09)	151.20 lbs volatile organic compound (VOC)/day and 27.59 tons VOC/yr  0.02 lb particulate emissions (PE)/hr and 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) (PTI #03-17421, issued 5/7/09)	62.5 tons VOC per rolling, 12-month period for emissions units P004 through P006 and P048, combined  See b)(2)b. and 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 63.5780 – 63.5930)  [In accordance with 40 CFR 63.5795(b), this emission unit is an existing affected source consisting of mixing operations at an existing reinforced plastic composites production facility.]	Standards - 40 CFR 63.5805(b) - See b)(2)f.  See b)(2)g., d)(4), e)(3) and f)(3)
g.	40 CFR 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(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 and 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 standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Items #6, #7 and #8 for mixing and BMC manufacturing operations.
- g. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.
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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.

[OAC rule 3745-77-07(A) and PTI #03-17421]

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:

VOC emissions (lbs/day) = summation of [(Pi x Si x EF)] for i = 1 to n

where:

i = 1, 2, ...n;

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

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

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

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 times1 ton/2000 lbs].

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

- (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:

VOC emissions (lbs/month) = summation of [(Pi x Si x EF)] for i = 1 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;

$EF = 0.0125$  = 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

- (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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

- (4) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5915(a) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), PTI #03-17421 and 40 CFR, Part 63, Subpart WWWW]

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 and P048 combined; and
  - iii. any exceedance of the maximum annual styrene usage rate of 5000 tons for emissions units P004 through P006 and 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).



[OAC rule 3745-77-07(C)(1), PTI #03-17421 and 40 CFR, Part 63, Subpart WWWW]

- (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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

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

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1), PTI #03-17421 and 40 CFR, Part 63, Subpart WWWW]

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 methods:

a. Emission Limitations: 151.20 lbs VOC/day and 27.59 tons VOC/yr

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

b. Emission Limitations: 0.02 lb PE/hr and 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)\*; and

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 through 5 of 40 CFR Part 60, Appendix A.

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.02 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

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

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

- 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 demonstrated based on the record keeping requirements specified in section d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

- e. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

- (3) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:



63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Items #6, #7 and #8 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1), PTI #03-17421 and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

- (1) 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]



**2. P021, Injection Press #602**

**Operations, Property and/or Equipment Description:**

Injection press for molding fabricated products.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-16162, issued 8/24/04)	0.29 lb organic compounds (OC)/hr and 1.28 tons OC/yr
b.	OAC rule 3745-21-07(G)	None [See b)(2)a.]
c.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930)  [In accordance with 40 CFR 63.5795(b), this emission unit is an existing affected source consisting of closed molding operations using compression/injection molding at an existing reinforced plastic composites production facility.]	Standards - 40 CFR 63.5805(b) - See b)(2)b.  See b)(2)c., d)(1), e)(1) and f)(3)
d.	40 CFR 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

b. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #1 for new or existing closed molding operations using compression/injection molding.



- c. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.
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c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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

63.5915(a) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), PTI #03-16162 and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

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

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1), PTI #03-16162 and 40 CFR, Part 63, Subpart WWWW]

f) Testing Requirements

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

- a. Emission Limitations: 0.29 lb OC/hr and 1.28 ton OC /yr

Applicable Compliance Method: The emission limitations are based on the emission unit's Potential to Emit\*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.

\*The potential to emit for this emissions unit is based on a maximum throughput of 262 lbs BMC per hour, multiplied by a maximum resin content of 0.20 lb resin per lb BMC (20%), then multiplied by a maximum resin styrene (OC monomer) content of 0.30 (30%), then multiplied by an emission factor of 0.0186 (1.86%)



(emissions factor is based on a consolidation of information from the Society of the Plastics Industry (SPI) and other sources).

The annual allowable OC limitation was developed by multiplying the hourly limitation by 8760 and then dividing by 2000.

[OAC rule 3745-77-07(C)(1) and PTI #03-16162]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-16162]

- (3) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #1 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1), PTI #03-16162 and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

- (1) The permittee shall maintain a current list of BMC raw materials in use which provides all of the OC data necessary to evaluate compliance as described in Section f)(1) above. Such information shall be retained for at least 5 years after the issuance date of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-16162]



**3. P033, Compression Press #696**

**Operations, Property and/or Equipment Description:**

Compression press for molding fabricated products.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-16162, issued 8/24/04)	0.15 lb organic compounds (OC)/hr and 0.64 ton OC/yr
b.	OAC rule 3745-21-07(G)	None [See b)(2)a.]
c.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930)  [In accordance with 40 CFR 63.5795(b), this emission unit is an existing affected source consisting of closed molding operations using compression/injection molding at an existing reinforced plastic composites production facility.]	Standards - 40 CFR 63.5805(b) - See b)(2)b.  See b)(2)c., d)(1), e)(1) and f)(3)
d.	40 CFR 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

b. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #1 for new or existing closed molding operations using compression/injection molding.



- c. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.
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c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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

63.5915(a) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), PTI #03-16162 and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

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

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1), PTI #03-16162 and 40 CFR, Part 63, Subpart WWWW]

f) Testing Requirements

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

- a. Emission Limitations: 0.15 lb OC/hr and 0.64 ton OC/yr

Applicable Compliance Method: The emission limitations are based on the emission unit's potential to emit\*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.

\*The potential to emit for this emissions unit is based on a maximum throughput of 109 lbs BMC per hour, multiplied by a maximum resin content of 0.24 lb resin per lb BMC (24%), then multiplied by a maximum resin styrene (OC monomer) content of 0.30 (30%), then multiplied by an emission factor of 0.0186 (1.86%)



(emissions factor is based on a consolidation of information from the Society of the Plastics Industry (SPI) and other sources).

The annual allowable OC limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000.

[OAC rule 3745-77-07(C)(1) and PTI #03-16162]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-16162]

- (3) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #1 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1), PTI #03-16162 and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

- (1) The permittee shall maintain a current list of BMC raw materials in use which provides all of the OC data necessary to evaluate compliance as described in Section f)(1) above. Such information shall be retained for at least 5 years after the issuance date of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-16162]



4. **P047, Injection Press #1726**

**Operations, Property and/or Equipment Description:**

Injection press for molding fabricated products.

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)(ii) (P0103638, issued 3/24/09)	See b)(2)a.
b.	OAC rule 3745-21-07(G)	None [See b)(2)b.]
c.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930)  [In accordance with 40 CFR 63.5795(b), this emission unit is an existing affected source consisting of closed molding operations using compression/injection molding at an existing reinforced plastic composites production facility.]	Standards - 40 CFR 63.5805(b) - See b)(2)c.  See b)(2)d., d)(2), e)(1) and f)(1)
d.	40 CFR 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

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

The potential to emit for this emissions unit is 5.87 tons per year and was determined by multiplying a maximum bulk mold compound (BMC) usage rate of 1000 lbs/hr by a maximum VOC (styrene) content of 7.2% by an emission factor of 1.86%, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.



- b. This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01.

[Note: On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. 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)].

- c. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #1 for new or existing closed molding operations using compression/injection molding.
- d. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.
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c) Operational Restrictions

- (1) None.

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 of each bulk mold compound employed;
  - b. the pounds of each bulk mold compound employed;
  - c. the VOC (styrene) content, in percent by weight, for each bulk mold compound employed;
  - d. the VOC emissions for each bulk mold compound employed [d)(1)b. times d)(1)c. times 1.86% VOC volatilization emission factor\*];
 

\*Emission factor is based on a consolidation of information from the Society of Plastics Industry (SPI) and other sources
  - e. the total VOC emissions for all bulk mold compounds employed [sum of d)(1)d.]; and



- f. the annual, year-to-date VOC emissions from all bulk mold compounds employed, in tons, [sum of d)(1)e. for each calendar day to date from January to December times the total calendar days to date times 1 ton/2000 lbs].

[OAC rule 3745-77-07(C)(1) and P0103638]

- (2) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5915(a) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), P0103638 and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

- (1) The permittee shall submit annual reports that specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[OAC rule 3745-77-07(C)(1) and P0103638]

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

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1), P0103638 and 40 CFR, Part 63, Subpart WWWW]

f) Testing Requirements

- (1) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #1 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Title V Permit**

**Permit Number:** P0087821

**Facility ID:** 0386010104

**Effective Date:** To be entered upon final issuance

[OAC rule 3745-77-07(C)(1), P0103638 and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

- (1) 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 03-16162 issued on August 24, 2004.

[OAC rule 3745-77-07(C)(1) and P0103638]



**5. P051, RTM Paste Mixer**

**Operations, Property and/or Equipment Description:**

Resin Paste Mixer.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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 374531-05(A)(3) (PTI #03-17358, issued 1/10/08)	3.00 lbs organic compounds (OC)/hr and 13.14 tons OC/yr  See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.
e.	OAC rule 3745-21-07(G)(2)	See b)(2)e.
f.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930)  [In accordance with 40 CFR 63.5795(a), this emission unit is a new affected source consisting of mixing operations at an existing reinforced plastic composites production facility.]	Standards - 40 CFR 63.5805(b) - See b)(2)f.  See b)(2)g., d)(2), e)(2) and f)(2)
g.	40 CFR 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. The emission limitation of 3.00 lbs OC/hr was established to reflect the potential to emit for this emissions unit. Therefore, no daily record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.



- b. "The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A) (3) do not apply to the particulate emissions (PE) from this air contaminant source because the calculated annual emission rate for PE is less than ten tons per year.

The potential to emit for this emissions unit is 2.63 tons per year and was determined by multiplying a maximum uncontrolled particulate emission to the baghouse of 0.6 lb PE/hr, by 8760 hrs/yr and dividing by 2000 lbs/ton. It should be noted that emissions unit P051 is vented to a baghouse as an additional measure to prevent any industrial hygiene or housekeeping issues. The use of the baghouse is not included in the potential to emit calculations.

- c. This emissions unit is exempt from the visible particulate emission limitations 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.
- d. 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)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11(B)(2).
- e. OAC Rule 3745-21-07 (G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).
- f. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Items #6, #7 and #8 for mixing and BMC manufacturing operations.
- g. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.
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c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for emissions unit P051:
  - a. the company identification for each resin mixed;
  - b. the amount of each resin mixed, in pounds;
  - c. the organic compound content, in percent by weight, of each resin;



- d. the organic compound emission rate from each resin, in pounds per month, [d)(1)b. x d)(1)c. x emission factor of 0.005 lb OC emitted/lb of OC mixed];
- e. the total organic compound emission rate from all resin, in pounds, [summation of d)(1)d.]; and
- f. the annual, year-to-date organic compound emissions from all resin, in tons [sum of d)(1)e. for each calendar month to date from January to December x total calendar months to date x 1 ton/2000 lbs].

[OAC rule 3745-77-07(C)(1) and PTI #03-17358]

- (2) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5915(a) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(A)(1), PTI #03-17358 and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

- (1) The permittee shall submit annual reports that specify the total organic compound emissions from emissions unit P051 for the previous calendar year. These reports shall be submitted by January 31 of each year and shall be submitted in accordance with the General Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17358]

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

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(A)(1), PTI #03-17358 and 40 CFR, Part 63, Subpart WWWW]

f) Testing Requirements

- (1) Compliance with the emission limitations specified in Section b)(1) of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation: 3.0 lbs organic compound/hr

Applicable Compliance Method: The hourly emission limitation represents the potential to emit\* of this emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.



\*The potential to emit was based on the following: The maximum hourly pounds of resin mixed (1500 lbs/hr) x the maximum OC content by weight (0.40 lb OC/lb resin) x a company supplied OC emission factor of 0.0050 lb OC emitted/lb OC mixed.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

[OAC rule 3745-77-07(C)(1) and PTI #03-17358]

- b. Emission Limitation: 13.14 tons OC/yr

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17358]

- (2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Items #6, #7 and #8 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(A)(1), PTI #03-17358 and 40 CFR, Part 63, Subpart WWWW]

- g) Miscellaneous Requirements

- (1) None.



**6. P801, Plantwide CU**

**Operations, Property and/or Equipment Description:**

Facility wide cleanup operations.

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) (P0103672, issued 3/24/09)	1815 lbs organic compounds (OC)/month and 10.89 tons OC/yr
b.	OAC rule 3745-21-07(G)	None [See b)(2)a.]
c.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930)  [In accordance with 40 CFR 63.5795(b), this emission unit is an existing affected source consisting of cleaning operations at an existing reinforced plastic composites production facility.]	Standards - 40 CFR 63.5805(b) - See b)(2)c.  See b)(2)d., d)(2), e)(3) and f)(2)
d.	40 CFR 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirement to comply with OAC rule 3745-21-07 (G) still exists as part of the federally-approved SIP of Ohio.



It should be noted that OAC rule 3745-21-07(G)(2) does not establish any requirements for this emissions unit due to the restriction prohibiting the use of photochemically reactive material [see c)(2)]. The restriction on the use of photochemically reactive material shall terminate on the date the U.S. EPA approves the rule rescindment and new rule as a revision of the Ohio SIP.

- b. 40 CFR Part 63, Subpart WWWW shall only apply to cleaning operations associated with reinforced plastic composites production as defined in 40 CFR Part 63.5785.
- c. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #2 for new or existing cleaning operations.
- d. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.
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c) Operational Restrictions

- (1) The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, is prohibited in this emissions unit.

[OAC rule 3745-77-07(A)(1) and P0103672]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for cleanup materials employed in emissions unit P801:
  - a. the company name and identification for each cleanup material employed;
  - b. documentation indicating whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01;.
  - c. the volume, in gallons, of each cleanup material employed;
  - d. the OC content of each cleanup material employed, in pound per gallon;
  - e. the OC emission rate, in pounds, for each cleanup material employed [(d)(1)c. times d)(1)d.);

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off site



for disposal or reclamation [minus solids content of said material]) x solvent density.

- f. the total OC emissions rate from all cleanup materials employed [summation of d)(1)e.]; and
- g. the annual year-to-date OC emissions, in tons, from all cleanup materials employed [summation of d)(1)e. for each calendar month to date from January to December times 1 ton/2000 lbs].

- (2) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5915(a) and (d)	Records that must be kept
63.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), P0103672 and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports in accordance with the reporting requirements of the Standard Terms and Conditions of this permit, except as indicated in e)(2) below.

[OAC rule 3745-77-07(C)(1) and P0103672]

- (2) In lieu of the quarterly deviation (excursion) reports\* required by the Standard Terms and Conditions of this permit for the 10.89 tons OC per year emission limitation, the permittee shall submit annual reports that specify the total organic compound emissions from this emissions unit for the previous calendar year. The annual reports shall be submitted by January 31 of each year.

\*It should be noted that quarterly written reports of other deviations as specified in term c)(2) are still required to be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and P0103672]

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

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1), P0103672 and 40 CFR, Part 63, Subpart WWWW]



f) Testing Requirements

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

a. Emission Limitation: 1815 lbs OC/month & 10.89 tons OC/yr from cleanup operations

Applicable Compliance Method: Compliance shall be based on the recordkeeping in section d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and P0103672]

(2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #2 of this subpart]

[OAC rule 3745-77-07(C)(1), P0103672 and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

(1) None.



**7. R001, Gelcoat Spray Booth**

**Operations, Property and/or Equipment Description:**

Gelcoat application booth.

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)(b)	See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-07(A)	See b)(2)c.
c.	OAC rule 3745-17-11(B)	See b)(2)d.
d.	OAC rule 3745-21-07(G)(2)	Organic compounds (OC) emissions shall not exceed 8 pounds per hour and 40 pounds per day
e.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930)  [In accordance with 40 CFR 63.5795(a), this emission unit is a new affected source consisting of open molding with atomized spray gel coat application at an existing reinforced plastic composites production facility.]	Organic HAP Emissions Factors – 40 CFR 63.5796 through 63.5799 – See b)(2)e.  Standards – 40 CFR 63.5805(b) – See b)(2)f.  See b)(2)g., b)(2)h., d)(2), (e)(2) and f)(2)
f.	40 CFR 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. "The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A) (3) do not apply to the particulate emissions (PE) from this air contaminant source because the calculated annual emission rate for PE is less than ten tons per year.



The potential to emit for PE from the gelcoat spray booth is negligible and has not been quantified to establish a potential to emit value for this emissions unit.

- b. "The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A) (3) do not apply to the organic compound emissions from this air contaminant source since the calculated annual emissions rate for organic compounds is less than ten tons per year taking into account the federally enforceable rule limit of 40 lbs organic compound per day under OAC rule 3745-21-07(G)(2).
- c. This emissions unit is exempt from the visible particulate emission limitations 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.
- d. 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)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11(B)(2).
- e. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5796	Organic HAP emissions factor equations in Table 1 of this subpart and how they are used in this subpart [See Table 1, Item #1.f of this subpart]
63.5797(a) – (c)	Determination of organic HAP content of resins and gel coats
63.5798(a) and (b)	If use or manufacture an application technology (new or existing) whose organic HAP emissions characteristics are not represented by the equations in Table 1 of this subpart
63.5799(a) – (c)	Calculating facility’s organic HAP emissions on a ton per year basis for purposes of determining which paragraphs of 63.5805 apply

- f. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the emission limitations stated in Table 3 of 40 CFR, Part 63, Subpart WWWW – Organic HAP Emission Limitations – Item #6 for open molding gel coat operations.
- g. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.
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- h. The permittee shall comply with the standards for this emission unit by using the following compliance option:

63.5810	Options for meeting the standards for open molding operations at new or existing sources
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c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for the gelcoat operation:
  - a. the company identification of each gelcoat employed;
  - b. the amount of each gelcoat employed, in pounds;
  - c. the organic compound content, in percent by weight, for each gelcoat employed;
  - d. the organic compound emissions rate from each gelcoat employed, in pounds per day  $[b)(1)b. \times b)(1)c. \times 0.75 \text{ lb OC/lb MMA or } X \text{ lb OC/lb styrene}$ , where X is calculated as specified for atomized spray gelcoat application under the Unified Emission Factors for Open Molding of Composites);
  - e. the total organic compound emission rate from all gelcoats employed, in pounds per day [sum of d)(1)d.];
  - f. the total number of hours the emissions unit was in operation; and
  - g. the average hourly organic compound emissions rate for all gelcoats employed,  $[d)(1)e. / d)(1)f.]$ , in pounds per hour.

[OAC rule 3745-77-07(C)(1) and PTI #03-17358]

- (2) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5895(c) and (d)	How to monitor and collect data to demonstrate continuous compliance
63.5915(a), (c) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

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

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that contain the following information:
  - a. an identification of each day during which the average hourly OC emissions from the gelcoat materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and



- b. an identification of each day during which the OC emissions from the gelcoat materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

The reports shall be submitted in accordance with the General Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17358]

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

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1), PTI #03-17358 and 40 CFR, Part 63, Subpart WWWW]

f) Testing Requirements

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

- a. Emission Limitation: OC emissions shall not exceed 8 pounds per hour and 40 pounds per day

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

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

[OAC rule 3745-77-07(C)(1) and PTI #03-17358]

- (2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 8, Item #1 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Title V Permit**

**Permit Number:** P0087821

**Facility ID:** 0386010104

**Effective Date:** To be entered upon final issuance

[OAC rule 3745-77-07(C)(1), PTI #03-17358 and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

(1) None.



**8. Emissions Unit Group - Group #1: P001, P003,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P001	Sigma blade mixer for mixing bulk molding compound.
P003	Sigma blade mixer for mixing bulk molding compound.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	None [See b)(2)a.]
b.	OAC rule 3745-17-11(B)	None [See b)(2)b.]
c.	OAC rule 3745-21-07(G)	None [See b)(2)c.]
d.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930)  [In accordance with 40 CFR 63.5795(b), these emission units are existing affected sources consisting of mixing operations at an existing reinforced plastic composites production facility.]	Standards - 40 CFR 63.5805(b) - See b)(2)d.  See b)(2)e., d)(1), e)(1) and f)(1)
e.	40 CFR 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. These emissions units are 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.

b. The uncontrolled mass rate of particulate emissions from each of these emissions units is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), this emissions unit is exempt from the requirements of OAC rule 3745-17-11(B)(2). Also, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Williams County.



- c. OAC rule 3745-21-07(G) is not applicable because the facility is not located in a "Priority 1" county and the emissions unit was installed prior to February 15, 1972.
- d. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Items #6, #7 and #8 for mixing and BMC manufacturing operations.
- e. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.
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c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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

63.5915(a) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

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

e) Reporting Requirements

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

63.5915(a) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

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

f) Testing Requirements

- (1) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be



	conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Items #6, #7 and #8 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

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

g) Miscellaneous Requirements

- (1) None.



**9. Emissions Unit Group - Group #2: P004, P006, P048,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P004	Sigma blade mixer for mixing bulk molding compound.
P006	Sigma blade mixer for mixing bulk molding compound.
P048	Sigma blade mixer for mixing bulk molding compound.

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) (PTI #03-17421, issued 5/7/09)	119.88 lbs volatile organic compound (VOC)/day and 21.88 tons VOC/yr from P004, P006 and P048 individually  0.01 lb particulate emission (PE)/hr and 0.05 ton PE/yr from P004, P006 and P048 individually  Visible PE shall not exceed 20% opacity, as a six-minute average.  See b)(2)a.
b.	OAC rule 3745-31-05(D) (PTI #03-17421, issued 5/7/09)	62.5 tons VOC/rolling, 12-month period for emissions units P004 through P006 and P048, combined  See b)(2)b. and 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 63.5780 – 63.5930)  [In accordance with 40 CFR 63.579(a) and (b), these emission units are new (P048) and existing (P004 and P006) affected sources consisting of mixing operations at an	Standards - 40 CFR 63.5805(b) - See b)(2)f.  See b)(2)g., d)(4), e)(3) and f)(3)



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	existing reinforced plastic composites production facility.]	
g.	40 CFR 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) control requirements for each of these emissions units 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 and P048 because these emissions units were installed prior to August 3, 2006. Emissions unit P004, P006 and P048 are not undergoing a physical change or change in the method of operation that would be considered a modification. Emissions units P004, P006 and 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 and 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 and P048, combined [See c)(1)].
- c. The uncontrolled mass rate of particulate emissions from each of these emissions units are 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. These emissions units are 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 these emissions units because these emissions units are 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 standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Items #6, #7 and #8 for mixing and BMC manufacturing operations.
- g. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.
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c) Operational Restrictions

- (1) The maximum annual styrene usage for emissions units P004 through P006 and 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.

[OAC rule 3745-77-07(A)(1) and PTI #03-17421]



d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for each 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;

$EF = 0.0125$  = 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].

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

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



VOC emissions (lbs/month) = summation of [(Pi x Si x EF)] for i = 1 to n

where:

i = 1, 2, ...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 = 0.0125 = 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

- (3) The permittee shall perform daily checks, when each emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving these emissions units. 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

- (4) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5915(a) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), PTI #03-17421 and 40 CFR, Part 63, Subpart WWWW]

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 and P048 combined; and
    - iii. any exceedance of the maximum annual styrene usage rate of 5000 tons for emissions units P004 through P006 and 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).

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stacks serving these emissions units 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

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

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1), PTI #03-17421 and 40 CFR, Part 63, Subpart WWWW]

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 Limitations: 119.88 lbs VOC/day and 21.88 tons VOC/yr from P004, P006 and P048 individually

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

- b. Emission Limitations: 0.01 lb PE/hr and 0.05 ton PE/yr from P004, P006 and P048 individually

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)\*; and

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 through 5 of 40 CFR Part 60, Appendix A.

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.01 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

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

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

- d. Emission Limitation: The maximum annual styrene usage for emissions units P004 through P006 and 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 demonstrated based on the record keeping requirements specified in section d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

- e. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

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



[OAC rule 3745-77-07(C)(1) and PTI #03-17421]

- (3) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Items #6, #7 and #8 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1), PTI #03-17421 and 40 CFR, Part 63, Subpart WWWW]

g) **Miscellaneous Requirements**

- (1) 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17421]



10. Emissions Unit Group - Group #3: P009, P014, P015, P016, P018, P019, P020, P042,

EU ID	Operations, Property and/or Equipment Description
P009	Injection press for molding fabricated products.
P014	Injection press for molding fabricated products.
P015	Injection press for molding fabricated products.
P016	Injection press for molding fabricated products.
P018	Injection press for molding fabricated products.
P019	Injection press for molding fabricated products.
P020	Injection press for molding fabricated products.
P042	Injection press for molding fabricated products.

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)(ii) (P0103638, issued 3/24/09)	See b)(2)a.
b.	OAC rule 3745-21-07(G)	None [See b)(2)b].
c.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930)  [In accordance with 40 CFR 63.5795(b), these emission units are existing affected sources consisting of closed molding operations using compression/injection molding at an existing reinforced plastic composites production facility.]	Standards - 40 CFR 63.5805(b) - See b)(2)c.  See b)(2)d., d)(2), e)(2) and f)(1)
d.	40 CFR 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.



(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the volatile organic compounds (VOC) from each of these air contaminant sources since the potential to emit for VOC is less than ten tons per year.

The potential to emit for each of these emissions units is 2.93 tons per year and was determined by multiplying a maximum bulk mold compound (BMC) usage rate of 500 lbs/hr by a maximum VOC (styrene) content of 7.2% by an emission factor of 1.86%, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

- b. These emissions units are not subject to the requirements in OAC rule 3745-21-07 (G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01.

[Note: On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for these emissions units. 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)].

- c. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #1 for new or existing closed molding operations using compression/injection molding.

- d. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.
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c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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



- d. the VOC emissions for each bulk mold compound employed [d)(1)b. times d)(1)c. times 1.86% VOC volatilization emission factor\*];

\*Emission factor is based on a consolidation of information from the Society of Plastics Industry (SPI) and other sources

- e. the total VOC emissions for all bulk mold compounds employed [sum of d)(1)d.]; and
- f. the annual, year-to-date VOC emissions from all bulk mold compounds employed, in tons, [sum of d)(1)e. for each calendar day to date from January to December times the total calendar days to date times 1 ton/2000 lbs].

[OAC rule 3745-77-07(C)(1) and P0103638]

- (2) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5915(a) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), P0103638 and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

- (1) The permittee shall submit annual reports that specify the total organic compound emissions from each emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[OAC rule 3745-77-07(C)(1) and P0103638]

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

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1), P0103638 and 40 CFR, Part 63, Subpart WWWW]

f) Testing Requirements

- (1) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance



	tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #1 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1), P0103638 and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

- (1) 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 03-16162 issued on August 24, 2004.

[OAC rule 3745-77-07(C)(1) and P0103638]



**11. Emissions Unit Group - Group #4: P010, P011, P012, P013, P032,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P010	Compression press for molding fabricated products.
P011	Compression press for molding fabricated products.
P012	Compression press for molding fabricated products.
P013	Compression press for molding fabricated products.
P032	Compression press for molding fabricated products.

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)(ii) (P0103638, issued 3/24/09)	See b)(2)a.
b.	OAC rule 3745-21-07(G)	None [See b)(2)b].
c.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930)  [In accordance with 40 CFR 63.5795(b), these emission units are existing affected sources consisting of closed molding operations using compression/injection molding at an existing reinforced plastic composites production facility.]	Standards - 40 CFR 63.5805(b) - See b)(2)c.  See b)(2)d., d)(2), e)(2) and f)(1)
d.	40 CFR 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the volatile organic compounds (VOC) from each of these air contaminant sources since the potential to emit for VOC is less than ten tons per year.



The potential to emit for each of these emissions units is 1.47 tons per year and was determined by multiplying a maximum bulk mold compound (BMC) usage rate of 250 lbs/hr by a maximum VOC (styrene) content of 7.2% by an emission factor of 1.86%, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

- b. These emissions units are not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01.

[Note: On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for these emissions units. 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)].

- c. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #1 for new or existing closed molding operations using compression/injection molding.
- d. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.
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c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for each emissions unit:
  - a. the company identification of each bulk mold compound employed;
  - b. the pounds of each bulk mold compound employed;
  - c. the VOC (styrene) content, in percent by weight, for each bulk mold compound employed;
  - d. the VOC emissions for each bulk mold compound employed [d)(1)b. times d)(1)c. times 1.86% VOC volatilization emission factor\*];

\*Emission factor is based on a consolidation of information from the Society of Plastics Industry (SPI) and other sources



- e. the total VOC emissions for all bulk mold compounds employed [sum of d)(1)d.]; and
- f. the annual, year-to-date VOC emissions from all bulk mold compounds employed, in tons, [sum of d)(1)e. for each calendar day to date from January to December times the total calendar days to date times 1 ton/2000 lbs].

[OAC rule 3745-77-07(C)(1) and P0103638]

- (2) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5915(a) and (d)	Records that must be kept
63.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), P0103638 and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

- (1) The permittee shall submit annual reports that specify the total organic compound emissions from each emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[OAC rule 3745-77-07(C)(1) and P0103638]

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

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1), P0103638 and 40 CFR, Part 63, Subpart WWWW]

f) Testing Requirements

- (1) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9,



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Title V Permit**  
**Permit Number:** P0087821  
**Facility ID:** 0386010104

**Effective Date:** To be entered upon final issuance

	Item #1 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1), P0103638 and 40 CFR, Part 63, Subpart WWWW]

- g) Miscellaneous Requirements
  - (1) None.



12. Emissions Unit Group - Group #5: P022, P023, P024, P025, P026, P027, P028, P029, P030, P049, P050,

EU ID	Operations, Property and/or Equipment Description
P022	Injection press for molding fabricated products.
P023	Injection press for molding fabricated products.
P024	Injection press for molding fabricated products.
P025	Injection press for molding fabricated products.
P026	Injection press for molding fabricated products.
P027	Injection press for molding fabricated products.
P028	Injection press for molding fabricated products.
P029	Injection press for molding fabricated products.
P030	Injection press for molding fabricated products.
P049	Injection press for molding fabricated products.
P050	Injection press for molding fabricated products.

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) (P0103671, issued 2/18/09)	32.14 lbs organic compounds (OC)/day and 5.87 tons OC/yr from P022 – P030, P049 and P050 individually  See b)(2)a.
b.	OAC rule 3745-21-07(G)	None [See b)(2)b.]
c.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930)  [In accordance with 40 CFR 63.5795(a) and (b), these emission units are new (P049 and P050) and existing (P022-P030) affected sources consisting of closed molding operations using compression/injection molding at an existing reinforced plastic composites production facility.]	Standards - 40 CFR 63.5805(b) - See b)(2)c.  See b)(2)d., d)(2), e)(2) and f)(2)
d.	40 CFR 63.1 – 15	Table 15 to Subpart WWWW of 40 CFR,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(40 CFR 63.5925)	Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) for these emissions units has been determined to be compliance with the terms and conditions of this permit.

[Note: The requirement to reevaluate BAT under OAC rule 3745-31-05(A)(3)(b) does not apply to emissions units P022-P027, P029-P030, P049 and P050 because these emissions units were installed prior to August 3, 2006. Emissions units P022-P027, P029-P030, P049 and P050 are not undergoing a physical change or change in the method of operation that would be considered a modification. Emissions units P022-P027, P029-P030, P049, and P050 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.]

- b. These emissions units are not subject to the requirements in OAC rule 3745-21-07 (G) because no liquid organic material is employed in these emissions units. "Liquid organic material" is defined in OAC rule 3745-21-07(C)(3).

[Note: On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for these emissions units. 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)].

- c. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #1 for new or existing closed molding operations using compression/injection molding.

- d. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.
---------	--

c) Operational Restrictions

- (1) None.



d) Monitoring and/or Recordkeeping Requirements

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

- a. the company identification of each bulk mold compound employed;
- b. the pounds of each bulk mold compound employed;
- c. the VOC (styrene) content, in percent by weight, for each bulk mold compound employed;
- d. the VOC emissions for each bulk mold compound employed [d)(1)b. times d)(1)c. times 1.86% VOC volatilization emission factor\*];

\*Emission factor is based on a consolidation of information from the Society of Plastics Industry (SPI) and other sources

- e. the total VOC emissions for all bulk mold compounds employed [sum of d)(1)d.]; and
- f. the annual, year-to-date VOC emissions from all bulk mold compounds employed, in tons, [sum of d)(1)e. for each calendar day to date from January to December times the total calendar days to date times 1 ton/2000 lbs].

[OAC rule 3745-77-07(C)(1) and P0103671]

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

63.5915(a) and (d)	Records that must be kept
63.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), P0103671 and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

(1) In lieu of the quarterly deviation (excursion) reporting requirements of the Standard Terms and Conditions of this permit, the permittee shall submit annual reports that specify the total organic compound emissions from each emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[OAC rule 3745-77-07(C)(1) and P0103671]

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

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See



	Table 14 of this subpart]
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[OAC rule 3745-77-07(C)(1), P0103671 and 40 CFR, Part 63, Subpart WWWW]

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 Limitations: 32.14 lbs VOC/day and 5.87 tons VOC/yr from P022 – P030, P049 and P050 individually

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

[OAC rule 3745-77-07(C)(1) and P0103671]

(2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #1 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1), P0103671 and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

(1) 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 03-16162 issued on August 24, 2004.

[OAC rule 3745-77-07(C)(1) and P0103671]



13. **Emissions Unit Group - Group #6: P034, P035,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P034	Compression press for molding fabricated products.
P035	Compression press for molding fabricated products.

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)(ii) (P0103638, issued 3/24/09)	See b)(2)a.
b.	OAC rule 3745-21-07(G)	None [See b)(2)b].
c.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930)  [In accordance with 40 CFR 63.5795(b), these emission units are existing affected sources consisting of closed molding operations using compression/injection molding at an existing reinforced plastic composites production facility.]	Standards - 40 CFR 63.5805(b) - See b)(2)c.  See b)(2)d., d)(2), e)(2) and f)(1)
d.	40 CFR 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the volatile organic compounds (VOC) from each of these air contaminant sources since the potential to emit for VOC is less than ten tons per year.

The potential to emit for each of these emissions units is 2.93 tons per year and was determined by multiplying a maximum bulk mold compound (BMC) usage



rate of 500 lbs/hr by a maximum VOC (styrene) content of 7.2% by an emission factor of 1.86%, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

- b. These emissions units are not subject to the requirements in OAC rule 3745-21-07 (G) because no liquid organic material is employed in these emissions units. "Liquid organic material" is defined in OAC rule 3745-21-01.

[Note: On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for these emissions units. 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)].

- c. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #1 for new or existing closed molding operations using compression/injection molding.
- d. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.
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c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for each emissions unit:
  - a. the company identification of each bulk mold compound employed;
  - b. the pounds of each bulk mold compound employed;
  - c. the VOC (styrene) content, in percent by weight, for each bulk mold compound employed;
  - d. the VOC emissions for each bulk mold compound employed [d)(1)b. times d)(1)c. times 1.86% VOC volatilization emission factor\*];

\*Emission factor is based on a consolidation of information from the Society of Plastics Industry (SPI) and other sources

- e. the total VOC emissions for all bulk mold compounds employed [sum of d)(1)d.]; and



- f. the annual, year-to-date VOC emissions from all bulk mold compounds employed, in tons, [sum of d)(1)e. for each calendar day to date from January to December times the total calendar days to date times 1 ton/2000 lbs].

[OAC rule 3745-77-07(C)(1) and P0103638]

- (2) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5915(a) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), P0103638 and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

- (1) The permittee shall submit annual reports that specify the total organic compound emissions from each emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[OAC rule 3745-77-07(C)(1) and P0103638]

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

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1), P0103638 and 40 CFR, Part 63, Subpart WWWW]

f) Testing Requirements

- (1) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #1 of this subpart]



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Title V Permit**

**Permit Number:** P0087821

**Facility ID:** 0386010104

**Effective Date:** To be entered upon final issuance

[OAC rule 3745-77-07(C)(1), P0103638 and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

- (1) 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 03-16162 issued on August 24, 2004.

[OAC rule 3745-77-07(C)(1) and P0103638]



14. **Emissions Unit Group - Group #7: P043, P044,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P043	Compression press for molding fabricated products.
P044	Compression press for molding fabricated products.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-16162, issued 8/24/04)	0.30 lb organic compounds (OC)/hr and 1.32 tons OC/yr from P043 and P044 individually
b.	OAC rule 3745-21-07(G)	None [See b)(2)a.]
c.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930)  [In accordance with 40 CFR 63.5795(b), these emission units are existing affected sources consisting of closed molding operations using compression/injection molding at an existing reinforced plastic composites production facility.]	Standards - 40 CFR 63.5805(b) - See b)(2)b.  See b)(2)c., d)(1), e)(1) and f)(3)
d.	40 CFR 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. These emissions units are not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in these emissions units. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

b. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of



40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #1 for new or existing closed molding operations using compression/injection molding.

- c. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.
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- c) Operational Restrictions

- (1) None.

- d) Monitoring and/or Recordkeeping Requirements

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

63.5915(a) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), PTI #03-16162 and 40 CFR, Part 63, Subpart WWWW]

- e) Reporting Requirements

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

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1), PTI #03-16162 and 40 CFR, Part 63, Subpart WWWW]

- f) Testing Requirements

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

- a. Emission Limitations: 0.30 lb OC /hr and 1.32 tons OC /yr from P043 and P044 individually

Applicable Compliance Method: The emission limitations are based on the emission units’ potential to emit\*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.



\*The potential to emit for these emissions units is based on a maximum throughput of 225 lbs BMC per hour, multiplied by a maximum resin content of 0.24 lb resin per lb BMC (24%), then multiplied by a maximum resin styrene (OC monomer) content of 0.30 (30%), then multiplied by an emission factor of 0.0186 (1.86%) (the emission factor is based on a consolidation of information from the Society of the Plastics Industry (SPI) and other sources).

The annual allowable OC limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000.

[OAC rule 3745-77-07(C)(1) and PTI #03-16162]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-16162]

- (3) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #1 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1), PTI #03-16162 and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

- (1) The permittee shall maintain a current list of BMC raw materials in use which provides all of the OC data necessary to evaluate compliance as described in Section f)(1) above. Such information shall be retained for at least 5 years after the issuance date of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-16162]



15. **Emissions Unit Group - Group #8: P052, P053,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P052	Resin transfer molding station 1.
P053	Resin transfer molding station 2.

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)(b) (PTI #03-17358, issued 1/10/08)	See b)(2)a.
b.	OAC rule 3745-21-07(G)(2)	See b)(2)b.
c.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930)  [In accordance with 40 CFR 63.5795(a), these emission units are new affected source consisting of BMC manufacturing operations at an existing reinforced plastic composites production facility.]	Standards - 40 CFR 63.5805(b) – See b)(2)c.  See b)(2)d., d)(2), e)(2) and f)(1)
d.	40 CFR 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3) do not apply to organic compounds from each of these air contaminant sources since the uncontrolled potential to emit for organic compounds is less than ten tons per year.

The potential to emit for each of these emissions units is 2.98 tons OC per year and was determined by multiplying a maximum resin paste usage rate of 168 lbs/hr x 0.286 lb OC/lb resin paste employed x an emission factor of 0.01 lb OC/lb OC applied + a maximum mold release usage rate of 0.20 lb/hr x 1 lb



OC/lb mold release employed x an emission factor of 1 lb OC/lb mold release applied, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

- b. The potential to emit for each of these emissions units is less than the allowable emission limitation established by this rule.
- c. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Items #6, #7 and #8 for mixing and BMC manufacturing operations.
- d. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.
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c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for each molding operation:
  - a. the company identification for each resin paste/mold release agent employed;
  - b. the amount of each resin paste/mold release agent employed, in pounds;
  - c. the organic compound content, in percent by weight, for each resin paste/mold release agent employed;
  - d. the organic compound emission rate for each resin paste/mold release agent employed, in pounds/month, [d)(1)b. x d)(1)c. x an emission factor of 0.01 lb OC/lb OC employed or 1.0 lb OC/lb mold release agent employed] for each resin paste/mold release employed;
  - e. the total organic compound emission rate for all resins/mold release agents employed, in lbs/month [sum of d)(1)d.]; and
  - f. the annual, year-to-date organic compound emissions from all resin paste/release agents employed, in tons [sum of d)(1)e. for each calendar month to date from January to December x total calendar months to date x 1 ton/2000 lbs].

[OAC rule 3745-77-07(C)(1) and PTI #03-17358]

- (2) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR, Part 63, Subpart WWWW, including the following sections:



63.5915(a) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), PTI #03-17358 and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

- (1) The permittee shall submit annual reports that specify the total organic compound emissions from emissions unit P052 and P053 for the previous calendar year. These reports shall be submitted by January 31 of each year and shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17358]

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

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1), PTI #03-17358 and 40 CFR, Part 63, Subpart WWWW]

f) Testing Requirements

- (1) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Items #6, #7 and #8 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1), PTI #03-17358 and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

- (1) None.



16. **Emissions Unit Group - Group #9: P054, P055,**

**EU ID      Operations, Property and/or Equipment Description**

P054      Assembly station 1.

P055      Assembly station 2.

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)(b) (PTI #03-17358, issued 1/10/08)	See b)(2)a.
b.	OAC rule 3745-21-07(G)(2)	See b)(2)b.
c.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930)  [In accordance with 40 CFR 63.5795(a), these emission units are new affected source consisting of BMC manufacturing operations at an existing reinforced plastic composites production facility.]	Standards - 40 CFR 63.5805(b) – See b)(2)c.  See b)(2)d., d)(2), e)(2) and f)(2)
d.	40 CFR 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.
e.	40 CFR, Part 63, Subpart PPPP (40 CFR 63.4480 - 63.4581)  [In accordance with 40 CFR 63.4482(c), these emission units are new affected sources consisting of general use coatings operations at an existing reinforced plastic composites production facility.]	For each new general use coating affected source: 0.16 kg (0.16 lb) organic hazardous air pollutant (HAP) emitted per kg (lb) coating solids used during each 12-month compliance period [40 CFR 63.4490(a)(1)]  See b)(2)e., d)(3), e)(3) and f)(3)
f.	40 CFR 63.1 – 15 (40 CFR 63.4501)	Table 2 to Subpart PPPP of 40 CFR, Part 63 – Applicability of General Provisions to Subpart PPPP shows which parts of the



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A) (3) do not apply to organic compounds from each of these air contaminant sources since the uncontrolled potential to emit for organic compounds is less than ten tons per year.

The potential to emit for each of these emissions units is 1.49 tons OC per year and was determined by multiplying a maximum emission rate of 0.34 lb OC/hr by a maximum operating rate of 8760 hrs/yr and dividing 2000 lbs/ton. The maximum lb/hr emission rate was determined using the following:

Raw Material	Maximum Throughput (lb/hr)	OC Employed	OC Content (lb OC/lb thinned gelcoat or adhesive)	Emission Factor (lb OC emitted/lb OC applied)	lb/hr OC Emitted
Thinned Gelcoat	0.8	Styrene	0.299	0.1257	0.03
Thinned Gelcoat	0.8	MMA	0.034	0.2118	0.006
Thinned Gelcoat	0.8	Acetone	0.125	1	0.10
Adhesive	4	MMA	0.60	0.05	0.12
Adhesive	4	MMA	0.40	0.05	0.08
<b>Total</b>					0.34

- b. The potential to emit for these emissions units is less than the allowable emission limitation established by this rule.
- c. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Items #6, #7 and #8 for mixing and BMC manufacturing operations.



- d. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.
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- e. The permittee has elected to use either the compliance option provided by 40 CFR 63.4491(a) [compliant material option] or 40 CFR 63.4491(b) [emission rate without add-on controls option]. This is accomplished by demonstrating that the organic HAP emissions rate for the coating operation is less than or equal to the applicable emission limit in 63.4490, calculated as a rolling 12-month emissions rate and determined on a monthly basis. The permittee must meet all of the requirements of 63.4540, 63.4541 and 63.4542 for the compliant material option, if this option is chosen, or 63.4550, 63.4551, and 63.4552 for the emission rate without add-on controls option, if this option is chosen, to demonstrate compliance with the emissions limit. The permittee is required to notify the Ohio EPA, Northwest District Office prior to the use of another compliance option as identified in 40 CFR 63.4491.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for each assembly operation:
  - a. the company identification for each thinned gelcoat/adhesive employed;
  - b. the amount of each thinned gelcoat/adhesive employed, in pounds;
  - c. the organic compound content, in percent by weight, for each thinned gelcoat/adhesive employed;
  - d. the organic compound emission rate for each thinned gelcoat/adhesive employed, in pounds/month, [d)(1)b. x d)(1)c. x the appropriate emission factor from the table listed below] for each thinned gelcoat/adhesive employed;

Raw Material	OC employed	Emission Factor lb OC emitted/lb OC applied
Thinned Gelcoat	Styrene	0.1257
Thinned Gelcoat	MMA	0.2118
Thinned Gelcoat	Acetone	1
Adhesive	MMA	0.05
Adhesive	MAA	0.05



- e. the total organic compound emission rate for all thinned gelcoats/adhesives employed, in lbs/month [sum of d)(1)d.]; and
- f. the annual, year-to-date organic compound emissions from all thinned gelcoats/adhesives employed, in tons [sum of d)(1)e. for each calendar month to date from January to December x total calendar months to date x 1 ton/2000 lbs].

[OAC rule 3745-77-07(C)(1) and PTI #03-17358]

- (2) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5915(a) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), PTI #03-17358 and 40 CFR, Part 63, Subpart WWWW]

- (3) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart PPPP (the predominant activity at the facility), including the following sections:

63.4530	Records that must be kept
63.4531	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), PTI #03-17358 and 40 CFR, Part 63, Subpart PPPP]

e) Reporting Requirements

- (1) The permittee shall submit annual reports that specify the total organic compound emissions from each emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year and shall be submitted in accordance with the General Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17358]

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

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1), PTI #03-17358 and 40 CFR, Part 63, Subpart WWWW]

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



63.4510	Notifications that must be submitted
63.4520	Reports that must be submitted

[OAC rule 3745-77-07(C)(1), PTI #03-17358 and 40 CFR, Part 63, Subpart PPPP]

f) Testing Requirements

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

a. Emission Limitation: For each new general use coating affected source - 0.16 kg (0.16 lb) organic hazardous air pollutant (HAP) emitted per kg (lb) coating solids used during each 12-month compliance period

Applicable Compliance Method: The permittee shall demonstrate compliance with this limitation based upon the record keeping requirements specified in section d)(3) and the compliance requirements and test requirements specified in section f)(3) of the terms and conditions of this permit.

(2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Items #6, #7 and #8 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1), PTI #03-17358 and 40 CFR, Part 63, Subpart WWWW]

(3) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart PPPP, including the following sections:

63.4500	General requirements for complying with this subpart
63.4540	Compliance Requirements for the Compliant Material Option – By what date must I conduct the initial compliance demonstration*
63.4541	Compliance Requirements for the Compliant Material Option – How do I demonstrate initial compliance with the emission limitations*
63.4542	Compliance Requirements for the Compliant Material Option – How do I demonstrate continuous compliance with the emission limitations*
63.4550	Compliance Requirements for the Emission Rate Without Add-On Controls – By what date must I conduct the initial compliance demonstration*
63.4551	Compliance Requirements for the Emission Rate Without Add-On Controls – How do I demonstrate initial compliance with the emission limitations*



63.4552	Compliance Requirements for the Emission Rate Without Add-On Controls – How do I demonstrate continuous compliance with the emission limitations*
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\*The permittee has elected to use either the compliance option provided by 40 CFR 63.4491(a) [compliant material option] or 40 CFR 63.4491(b) [emission rate without add-on controls option]. The permittee must meet all of the requirements of 63.4540, 63.4541 and 63.4542 for the compliant material option, if this option is chosen, or 63.4550, 63.4551, and 63.4552 for the emission rate without add-on controls option, if this option is chosen, to demonstrate compliance with the emissions limit [See b)(2)e].

[OAC rule 3745-77-07(C)(1), PTI #03-17358 and 40 CFR, Part 63, Subpart PPPP]

g) Miscellaneous Requirements

- (1) None.