



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

05/15/02

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

02-04-02-0245
Venture Holdings Corp-Conneaut Facility
Raymond A. Kovacs
333 Gore Road
Conneaut, OH 44030

Dear Raymond A. Kovacs:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Northeast District Office
File, DAPC PMU



State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: 05/15/02

Effective Date: 05/15/02

Expiration Date: 05/15/07

This document constitutes issuance of a Title V permit for Facility ID: 02-04-02-0245 to:
Venture Holdings Corp-Conneaut Facility
333 Gore Road
Conneaut, OH 44030

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and Emissions Unit Activity Description. Rows include P001 (SMC Facilities) One Compounding Line and Two Mixers, P005 (Press 1) Press 1, P006 (Press 2) Press 2, P007 (Press 3) Press 3, P008 (Press 4) Press 4, P009 (Press 5) Press 5, P010 (Press 6) Press 6, P011 (Press 7) Press 7, P012 (Press 8) Press 8, P013 (Press 9) Press 9, P014 (Press 10) Press 10, P016 (Press 12) Press 12, P017 (Press 13) Press 13, P018 (Press 14) Press 14, P019 (Press 15) Press 15, P020 (Press 16) Press 16, P021 (Press 17) Press 17, P022 (Press 18) Press 18, P023 (Press 19) Press 19, P024 (Press 20) Press 20, P025 (Jayco SMC Mixer) Jayco SMC Mixer, P026 (Press 21) Press 21.

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. 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. 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, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

OHIO ENVIRONMENTAL PROTECTION AGENCY

Handwritten signature of Christopher Jones

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. *State and Federally Enforceable Section*

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

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. 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. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., 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.) See B.6 below if no deviations occurred during the quarter.

- (Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))*
- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- (Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))*
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- (Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

2. **Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset condition, of any emissions unit(s) 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upset conditions.

Except as provided in OAC rule 3745-15-06, 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).

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

3. **Risk Management Plans**

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

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

4. **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))

5. **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))

6. 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 A.10 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.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. 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))

8. 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))

9. 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 general terms and conditions shall apply to all operating scenarios authorized in this permit.

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

10. 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))

11. 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))

12. 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:
 - i. 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.
 - ii. 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.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. 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:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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:
 - i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. 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.
- iii. 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))

13. 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))

14. 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))

15. 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))

16. 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 emission 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; and
- 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.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

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

17. 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.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

19. 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))

20. 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))

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

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 (a) 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, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., 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.)

2. Records Retention Requirements

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.

3. 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.

4. 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).

5. 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.

6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. **PROPOSED MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (MACT) STANDARDS**
Within 120 days after promulgation of the National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report:
 - a. The name and mailing address of the permittee;
 - b. The physical location of the source if it is different from the mailing address;
 - c. Identification of the relevant MACT standard and the permittee's compliance date;
 - d. A brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and
 - e. A statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.
2. Within 60 days following completion of the required compliance demonstration activity specified in the 40 CFR 63, the permittee shall submit a notification of compliance status that contains the following information:
 - a. The methods used to determine compliance;
 - b. The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
 - c. The methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;
 - d. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR Part 63, Subpart WWWW;
 - e. An analysis demonstrating whether the affected source is a major source or an area source;
 - f. A description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and
 - g. A statement of whether or not the permittee has complied with the requirements of 40 CFR 63, Subpart WWWW.

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

B001 - 7.5 million Btu/hr gas/oil boiler; Cleaver Brooks boiler #1
B002 - 2.8 million Btu/hr gas/oil heater; Johnson heater #1
B003 - 6.2 million Btu/hr gas/oil heater; Johnson heater #2
B004 - 3.3 million Btu/hr gas/oil boiler; 80 hp York-Shipley boiler
B005 - 7.3 million Btu/hr gas/oil boiler; Cleaver Brooks boiler #2
T002 - 6,000-gallon storage tank #2 for polyester resin/styrene
T003 - 6,000-gallon storage tank #3 for polyester resin/styrene
T004 - 6,000-gallon storage tank #4 for polyester resin/styrene
T009 - 6,000-gallon storage tank #1 for polyester resin/styrene

Each insignificant emissions unit at this facility must comply with all State and federal regulations, as well as any emissions limitations and/or control requirements contained within a Permit to Install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: SMC Facilities (P001)

Activity Description: One Compounding Line and Two Mixers

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Mix operations (only): mixer #1 for polyester resin/styrene paste production with a baghouse (JAYC0DC)	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from this emissions unit shall not exceed 20% opacity as a 6-minute average, except as specified by rule. The PE rate shall not exceed 5.76 lbs/hr.
	OAC rule 3745-17-11(B)(1)	
Mixer #1 for polyester resin/styrene paste production with a baghouse (JAYC0DC) and a compounding machine for sheet mold compound (SMC) production with a baghouse (CE2)	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day, excluding emissions from non-photochemically reactive clean-up materials. See A.I.2.a. The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-11(B)(1), and OAC rule 3745-21-07(G)(2). See A.I.2.b.
	OAC rule 3745-31-05(A)(3) PTI 02-896	

2. Additional Terms and Conditions

- 2.a The emissions of organic materials from the mixer operations and the compounding operations are comprised of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
- 2.b No annual emissions limits, in tons/year, were included in the Permit to Install (PTI 02-896) for this emissions unit.

II. Operational Restrictions

1. The pressure drop across each of the fabric filters (CE2 & JAYC0DC) shall be maintained within the range recommended by the manufacturer while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across each of the fabric filters (CE2 & JAYC0DC) while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across each of the fabric filters (CE2 & JAYC0DC) on a once per eight (8)-hour shift basis.

III. Monitoring and/or Record Keeping Requirements (continued)

- 2.a** The permittee shall collect and record the following information for each day for the mixer operations at this emissions unit:
- i. The company identification for each mix manufactured.
 - ii. The number of pounds of each mix manufactured.
 - iii. The styrene content of each mix manufactured, in percent by weight.
 - iv. The OC emission rate for all mixes manufactured, in pounds per day.
 - v. The number of hours the mixer(s) was in operation.
- 2.b** The permittee shall collect and record the following information for each day for the compounding operations and cleanup operations at this emissions unit:
- i. The company identification for each resin/styrene paste material and each cleanup material employed.
 - ii. Documentation as to whether or not each cleanup material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C).
 - iii. The weight of each polyester resin/styrene paste material employed, in pounds per day.
 - iv. The total OC content of each polyester resin/styrene paste material employed, in percent by weight.
 - v. The OC emission rate for all polyester resin/styrene paste materials processed at the compounding machine, in pounds per day.
 - vi. The actual number of hours that the compounding machine was in operation.
 - vii. The volume of each cleanup material dispensed, in gallons.
 - viii. The volume of each cleanup material returned, in gallons.
 - ix. The volume of each evaporated cleanup material, which is estimated by subtracting the volume of returned cleanup material from the volume of dispensed cleanup material, in gallons per day.
 - x. The OC content of each cleanup material evaporated, in pounds per gallon.
 - xi. The total OC emission rate for all cleanup materials, in pounds per day.
- 2.c** The permittee shall collect and record the following information for each day for all operations at this emissions unit:
- i. The total OC emission rate for the mixer operations, the compounding operations, and the photochemically reactive cleanup materials, in pounds per day.
 - ii. The actual number of hours the emissions unit was in operation, which is the greater of mixer operations time or compounding operations time.
 - iii. The average hourly OC emission rate for for the mixer operations, the compounding operations, and the photochemically reactive cleanup materials, i.e., A.III.2.c.i. divided by A.III.2.c.ii., in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the pressure drop across baghouse CE2 did not comply with the allowable range specified in Section A.II.1.
 - b. An identification of each day during which the pressure drop across baghouse JAYCODC did not comply with the allowable range specified in Section A.II.1.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the mixer operations, the compounding operations, and the photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the OC emissions from the mixer operations, the compounding operations, and the photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
3. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation: 20% opacity of visible particulate emissions

Applicable Compliance Method: Compliance shall be determined based upon OAC rule 3745-17-03(B)(1).

- 1.b Emission Limitation: 5.76 lbs PE/hr

Applicable Compliance Method(s): To determine the actual worst case emission rate for particulate matter, the following equation may be used:

$$EH = P \times EF \times (1 - CE).$$

where the following applies:
EH = PE, in pounds per hour.

P = maximum dry solids throughput rate, which is 3320 pounds per hour as noted in the permit application.

EF = emission factor for uncontrolled PE, which is 0.01 pounds of uncontrolled PE per pound of dry solids processed, as noted in section 6.4 of AP-42 chapter 6.4 (5/83).

CE = control efficiency of PE control device, which is 99% as noted in the permit application.

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

- 1.c Emission Limitation: 8 lbs OC/hr, excluding emissions from non-photochemically reactive cleanup materials.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.2.c. of these terms and conditions. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

V. Testing Requirements (continued)

- 1.d Emission Limitation: 40 lbs OC/day, excluding emissions from non-photochemically reactive cleanup materials.

Applicable Compliance Methods: Compliance may be determined based upon the following equations:

i. Determination of OC emissions from the mixer operations:

$$E(\text{mix}) = [\text{summation of } (W_i \times SC_i)] \times EF.$$

Where the following applies:

$E(\text{mix})$ = total, daily, OC emissions from the mix operations, based upon the record keeping specified in section A.III.2.a. of these terms and conditions, in pounds per day.

W_i = the weight of mix "i" employed, in pounds per day.

OC_i = the OC content of mix "i", in percent by weight.

EF = the OC emission factor, in 0.01 pound of OC emissions per pound of available OC content, as noted in section 6.4 of AP-42 chapter 6.4 (5/83).

ii. Determination of OC emissions from the compounding operations:

$$E(\text{smc}) = [\text{summation of } (W_i \times OC_i)] \times EF.$$

where:

$E(\text{smc})$ = OC emissions as styrene from the sheet mold compounding (SMC) operations, based upon the record keeping specified in section A.III.2.b. of these terms and conditions, in pounds per day.

W_i = the weight of SMC "i" produced, in pounds per day.

OC_i = the OC content of SMC "i", in percent by weight.

EF = the OC emission factor, in 0.0012 pound of styrene emissions per pound of available styrene content, as determined from a Budd Plastics Division study, as presented to the October, 1999 Composite Fabricators Association Conference.

iii. Determination of OC emissions from photochemically reactive cleanup materials:

$$E(\text{pcr}) = E(\text{mix}) + E(\text{smc}) + E(\text{cleanup}).$$

where:

$E(\text{pcr})$ = OC emissions from mixer operations, compounding operations and cleanup operations.

$E(\text{cleanup})$ = OC emissions from cleanup materials, based upon the record keeping specified in section A.III.2.b. of these terms and conditions, in pounds per day. Only emissions from the employment of photochemically reactive cleanup materials are included.

2. Any determination of organic compound content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

VI. Miscellaneous Requirements

1. As of the effective date of this permit, OAC rule 3745-21-07 is being revised by Ohio EPA. Within 12 months of the effective date of the final rule revisions, a review of operations within this emissions unit will be made to determine if changes in rule applicability and requirements are warranted.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press 1 (P005)
Activity Description: Press 1

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #1 for fiberglass reinforced plastic parts	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.1.2.a and A.1.2.b.
	OAC rule 3745-31-05(A)(3) PTI 02-12229	OC emissions shall not exceed 6.56 lbs/day and 1.20 TPY.

2. Additional Terms and Conditions

- 2.a The hourly and daily emission limits based on this applicable rule are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic materials are comprised of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.
 - b. The total OC emission rate for all mold compounds employed, in pounds per day.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the OC emissions from the mold compounds exceeded 6.56 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation: 6.56 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds is based upon the following equation:

$E = \text{summation of } (W_i \times E_{Foc}) \text{ for all mold compounds.}$

where the following applies:

E = total, daily, OC emissions, in pounds per day.

W_i = the weight of mold compound "i" employed, in pounds per day.

E_{foc} = the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene Emissions During the Charging and Molding Cycle".

If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate to determine the hourly and daily emission rates.

1.b Emission Limitation: 1.20 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A.III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 pounds/ton.

- 2.** Any determination of organic compound content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any thinner or viscosity reducer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

Compression molding press #1 for fiberglass reinforced plastic parts

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene.

TLV (mg/m3): 85,000.

Maximum Hourly Emission Rate (lbs/hr): 13.61 for P005-P009, P013, P014 & P016-P024; and 1.49 for P025.

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 794 for P005-P009, P013, P014 & P016-P024; 1066 for P025; and 1860 for all styrene emissions units included in PTI 02-12229.

MAGLC (ug/m3): 2024 for all styrene emissions units included in PTI 02-12229.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press 2 (P006)
Activity Description: Press 2

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #2 for fiberglass reinforced plastic parts	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.1.2.a and A.1.2.b.
	OAC rule 3745-31-05(A)(3) PTI 02-12229	OC emissions shall not exceed 6.56 lbs/day and 1.20 TPY.

2. Additional Terms and Conditions

- 2.a The hourly and daily emission limits based on this applicable rule are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic materials are comprised of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.
 - b. The total OC emission rate for all mold compounds employed, in pounds per day.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the OC emissions from the mold compounds exceeded 6.56 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.1.1. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation: 6.56 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds is based upon the following equation:

$E = \text{summation of } (W_i \times E_{Foc}) \text{ for all mold compounds.}$

where the following applies:

E = total, daily, OC emissions, in pounds per day.

W_i = the weight of mold compound "i" employed, in pounds per day.

E_{foc} = the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene Emissions During the Charging and Molding Cycle".

If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate to determine the hourly and daily emission rates.

1.b Emission Limitation: 1.20 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A.III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 pounds/ton.

- 2.** Any determination of organic compound content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any thinner or viscosity reducer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #2 for fiberglass reinforced plastic parts		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene.

TLV (mg/m3): 85,000.

Maximum Hourly Emission Rate (lbs/hr): 13.61 for P005-P009, P013, P014 & P016-P024; and 1.49 for P025.

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 794 for P005-P009, P013, P014 & P016-P024; 1066 for P025; and 1860 for all styrene emissions units included in PTI 02-12229.

MAGLC (ug/m3): 2024 for all styrene emissions units included in PTI 02-12229.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press 3 (P007)
Activity Description: Press 3

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #3 for fiberglass reinforced plastic parts	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.1.2.a and A.1.2.b.
	OAC rule 3745-31-05(A)(3) PTI 02-12229	OC emissions shall not exceed 3.47 lbs/day and 0.63 TPY.

2. Additional Terms and Conditions

- 2.a The hourly and daily emission limits based on this applicable rule are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic materials are comprised of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.
 - b. The total OC emission rate for all mold compounds employed, in pounds per day.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the OC emissions from the mold compounds exceeded 3.47 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation: 3.47 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds is based upon the following equation:

$E = \text{summation of } (W_i \times E_{Foc}) \text{ for all mold compounds.}$

where the following applies:

E = total, daily, OC emissions, in pounds per day.

W_i = the weight of mold compound "i" employed, in pounds per day.

E_{foc} = the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene Emissions During the Charging and Molding Cycle".

If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate to determine the hourly and daily emission rates.

1.b Emission Limitation: 0.63 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A.III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 pounds/ton.

- 2.** Any determination of organic compound content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any thinner or viscosity reducer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

Compression molding press #3 for fiberglass reinforced plastic parts

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene.

TLV (mg/m3): 85,000.

Maximum Hourly Emission Rate (lbs/hr): 13.61 for P005-P009, P013, P014 & P016-P024; and 1.49 for P025.

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 794 for P005-P009, P013, P014 & P016-P024; 1066 for P025; and 1860 for all styrene emissions units included in PTI 02-12229.

MAGLC (ug/m3): 2024 for all styrene emissions units included in PTI 02-12229.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press 4 (P008)
Activity Description: Press 4

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #4 for fiberglass reinforced plastic parts	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.1.2.a and A.1.2.b.
	OAC rule 3745-31-05(A)(3) PTI 02-12229	OC emissions shall not exceed 6.75 lbs/day and 1.23 TPY.

2. Additional Terms and Conditions

- 2.a The hourly and daily emission limits based on this applicable rule are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic materials are comprised of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.
 - b. The total OC emission rate for all mold compounds employed, in pounds per day.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the OC emissions from the mold compounds exceeded 6.75 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.1.1. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation: 6.75 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds is based upon the following equation:

$E = \text{summation of } (W_i \times E_{Foc}) \text{ for all mold compounds.}$

where the following applies:

E = total, daily, OC emissions, in pounds per day.

W_i = the weight of mold compound "i" employed, in pounds per day.

E_{foc} = the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene Emissions During the Charging and Molding Cycle".

If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate to determine the hourly and daily emission rates.

1.b Emission Limitation: 1.23 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A.III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 pounds/ton.

2. Any determination of organic compound content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any thinner or viscosity reducer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

Compression molding press #4 for fiberglass reinforced plastic parts

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene.

TLV (mg/m3): 85,000.

Maximum Hourly Emission Rate (lbs/hr): 13.61 for P005-P009, P013, P014 & P016-P024; and 1.49 for P025.

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 794 for P005-P009, P013, P014 & P016-P024; 1066 for P025; and 1860 for all styrene emissions units included in PTI 02-12229.

MAGLC (ug/m3): 2024 for all styrene emissions units included in PTI 02-12229.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press 5 (P009)
Activity Description: Press 5

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #5 for fiberglass reinforced plastic parts	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.1.2.a and A.1.2.b.
	OAC rule 3745-31-05(A)(3) PTI 02-13528	OC emissions shall not exceed 0.48 lb/hr, 11.6 lbs/day and 2.11 TPY.

2. Additional Terms and Conditions

- 2.a The hourly and daily emission limits based on this applicable rule are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic materials are comprised of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.
 - b. The total OC emission rate for all mold compounds employed, in pounds per day.
 - d. The total number of hours the emissions unit was in operation.
 - e. The average hourly OC emission rate for all mold compounds employed, i.e., c/d, in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the mold compounds exceeded 0.48 pound per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the mold compounds exceeded 11.6 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation: 0.48 lb OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions.

1.b Emission Limitation: 11.6 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds is based upon the following equation:

$E = \text{summation of } (W_i \times E_{foc}) \text{ for all mold compounds.}$

where the following applies:

E = total, daily, OC emissions, in pounds per day.

W_i = the weight of mold compound "i" employed, in pounds per day.

E_{foc} = the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene Emissions During the Charging and Molding Cycle".

If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate to determine the hourly and daily emissions rates.

1.c Emission Limitation: 2.11 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A.III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 pounds/ton.

2. Any determination of organic compound content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any thinner or viscosity reducer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---------------------------------------	--

Compression molding press #5 for fiberglass reinforced plastic parts

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene.

TLV (mg/m3): 85,000.

Maximum Hourly Emission Rate (lbs/hr): 13.61 for P005-P009, P013, P014 & P016-P024; and 1.49 for P025.

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 794 for P005-P009, P013, P014 & P016-P024; 1066 for P025; and 1860 for all styrene emissions units included in PTI 02-12229.

MAGLC (ug/m3): 2024 for all styrene emissions units included in PTI 02-12229.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press 6 (P010)
Activity Description: Press 6

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #6 for fiberglass reinforced plastic parts	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.1.2.a.

2. Additional Terms and Conditions

- 2.a The emissions of organic materials are comprised of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.
 - b. The total OC emission rate for all mold compounds employed, in pounds per day.
 - d. The total number of hours the emissions unit was in operation.
 - e. The average hourly OC emission rate for all mold compounds employed, i.e., c/d, in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the mold compounds exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the mold compounds exceeded 40 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation: 8 lbs OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions.

1.b Emission Limitation: 40 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds is based upon the following equation:

$E = \text{summation of } (W_i \times E_{Foc}) \text{ for all mold compounds.}$

where the following applies:

$E =$ total, daily, OC emissions, in pounds per day.

$W_i =$ the weight of mold compound "i" employed, in pounds per day.

$E_{foc} =$ the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene Emissions During the Charging and Molding Cycle".

If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate to determine the hourly and daily emissions rates.

2. Any determination of organic compound content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any thinner or viscosity reducer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press 7 (P011)

Activity Description: Press 7

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #7 for fiberglass reinforced plastic parts	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.1.2.a.

2. Additional Terms and Conditions

- 2.a The emissions of organic materials are comprised of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.
 - b. The total OC emission rate for all mold compounds employed, in pounds per day.
 - d. The total number of hours the emissions unit was in operation.
 - e. The average hourly OC emission rate for all mold compounds employed, i.e., c/d, in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the mold compounds exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the mold compounds exceeded 40 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation: 8 lbs OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions.

1.b Emission Limitation: 40 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds is based upon the following equation:

$E = \text{summation of } (W_i \times E_{Foc}) \text{ for all mold compounds.}$

where the following applies:

$E = \text{total, daily, OC emissions, in pounds per day.}$

$W_i = \text{the weight of mold compound "i" employed, in pounds per day.}$

$E_{foc} = \text{the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene Emissions During the Charging and Molding Cycle".}$

If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate to determine the hourly and daily emissions rates.

2. Any determination of organic compound content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any thinner or viscosity reducer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press 8 (P012)
Activity Description: Press 8

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #8 for fiberglass reinforced plastic parts	OAC rule 3745-21-07(G)(2)	See section A.1.2.a. below.

2. Additional Terms and Conditions

- 2.a Since this emissions unit is an existing source that is not located in a Priority I county, it is exempt from the organic compound limitations specified in OAC rule 3745-21-07(G)(2) per OAC rule 3745-21-07(A)(1).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press 9 (P013)
Activity Description: Press 9

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #9 for fiberglass reinforced plastic parts	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.1.2.a and A.1.2.b.
	OAC rule 3745-31-05(A)(3) PTI 02-12229	OC emissions shall not exceed 3.47 lbs/day and 0.63 TPY.

2. Additional Terms and Conditions

- 2.a The hourly and daily emission limits based on this applicable rule are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic materials are comprised of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.
 - b. The total OC emission rate for all mold compounds employed, in pounds per day.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the OC emissions from the mold compounds exceeded 3.47 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.1.1. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation: 3.47 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds is based upon the following equation:

$E = \text{summation of } (W_i \times E_{Foc}) \text{ for all mold compounds.}$

where the following applies:

E = total, daily, OC emissions, in pounds per day.

W_i = the weight of mold compound "i" employed, in pounds per day.

E_{foc} = the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene Emissions During the Charging and Molding Cycle".

If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate to determine the hourly and daily emissions rates.

1.b Emission Limitation: 0.63 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A.III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 pounds/ton.

2. Any determination of organic compound content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any thinner or viscosity reducer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---------------------------------------	--

Compression molding press #9 for fiberglass reinforced plastic parts

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene.

TLV (mg/m3): 85,000.

Maximum Hourly Emission Rate (lbs/hr): 13.61 for P005-P009, P013, P014 & P016-P024; and 1.49 for P025.

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 794 for P005-P009, P013, P014 & P016-P024; 1066 for P025; and 1860 for all styrene emissions units included in PTI 02-12229.

MAGLC (ug/m3): 2024 for all styrene emissions units included in PTI 02-12229.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press 10 (P014)
Activity Description: Press 10

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #10 for fiberglass reinforced plastic parts	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.1.2.a and A.1.2.b.
	OAC rule 3745-31-05(A)(3) PTI 02-12229	OC emissions shall not exceed 0.52 lb/hr, 12.5 lbs/day and 2.29 TPY.

2. Additional Terms and Conditions

- 2.a The hourly and daily emission limits based on this applicable rule are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic materials are comprised of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.
 - b. The total OC emission rate for all mold compounds employed, in pounds per day.
 - d. The total number of hours the emissions unit was in operation.
 - e. The average hourly OC emission rate for all mold compounds employed, i.e., c/d, in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the mold compounds exceeded 0.52 pound per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the mold compounds exceeded 12.5 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation: 0.52 lb OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions.

1.b Emission Limitation: 12.5 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds is based upon the following equation:

$E = \text{summation of } (W_i \times E_{foc}) \text{ for all mold compounds.}$

where the following applies:

$E = \text{total, daily, OC emissions, in pounds per day.}$

$W_i = \text{the weight of mold compound "i" employed, in pounds per day.}$

$E_{foc} = \text{the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene Emissions During the Charging and Molding Cycle".}$

If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate to determine the hourly and daily emissions rates.

1.c Emission Limitation: 2.29 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A.III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 pounds/ton.

2. Any determination of organic compound content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any thinner or viscosity reducer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #10 for fiberglass reinforced plastic parts		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene.

TLV (mg/m3): 85,000.

Maximum Hourly Emission Rate (lbs/hr): 13.61 for P005-P009, P013, P014 & P016-P024; and 1.49 for P025.

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 794 for P005-P009, P013, P014 & P016-P024; 1066 for P025; and 1860 for all styrene emissions units included in PTI 02-12229.

MAGLC (ug/m3): 2024 for all styrene emissions units included in PTI 02-12229.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press 12 (P016)
Activity Description: Press 12

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #12 for fiberglass reinforced plastic parts	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.1.2.a and A.1.2.b.
	OAC rule 3745-31-05(A)(3) PTI 02-12229	OC emissions shall not exceed 0.43 lb/hr, 10.4 lbs/day and 1.90 TPY.

2. Additional Terms and Conditions

- 2.a The hourly and daily emission limits based on this applicable rule are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic materials are comprised of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.
 - b. The total OC emission rate for all mold compounds employed, in pounds per day.
 - d. The total number of hours the emissions unit was in operation.
 - e. The average hourly OC emission rate for all mold compounds employed, i.e., c/d, in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the mold compounds exceeded 0.43 pound per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the mold compounds exceeded 10.4 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation: 0.43 lb OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions.

1.b Emission Limitation: 10.4 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds is based upon the following equation:

$E = \text{summation of } (W_i \times E_{foc}) \text{ for all mold compounds.}$

where the following applies:

E = total, daily, OC emissions, in pounds per day.

W_i = the weight of mold compound "i" employed, in pounds per day.

E_{foc} = the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene Emissions During the Charging and Molding Cycle".

If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate to determine the hourly and daily emissions rates.

1.c Emission Limitation: 1.90 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A.III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 pounds/ton.

2. Any determination of organic compound content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any thinner or viscosity reducer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #12 for fiberglass reinforced plastic parts		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene.

TLV (mg/m3): 85,000.

Maximum Hourly Emission Rate (lbs/hr): 13.61 for P005-P009, P013, P014 & P016-P024; and 1.49 for P025.

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 794 for P005-P009, P013, P014 & P016-P024; 1066 for P025; and 1860 for all styrene emissions units included in PTI 02-12229.

MAGLC (ug/m3): 2024 for all styrene emissions units included in PTI 02-12229.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press 13 (P017)

Activity Description: Press 13

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #13 for fiberglass reinforced plastic parts	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.1.2.a and A.1.2.b.
	OAC rule 3745-31-05(A)(3) PTI 02-12229	OC emissions shall not exceed 6.75 lbs/day and 1.23 TPY.

2. Additional Terms and Conditions

- 2.a The hourly and daily emission limits based on this applicable rule are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic materials are comprised of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.
 - b. The total OC emission rate for all mold compounds employed, in pounds per day.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the OC emissions from the mold compounds exceeded 6.75 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation: 6.75 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds is based upon the following equation:

$E = \text{summation of } (W_i \times E_{Foc}) \text{ for all mold compounds.}$

where the following applies:

E = total, daily, OC emissions, in pounds per day.

W_i = the weight of mold compound "i" employed, in pounds per day.

E_{foc} = the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene Emissions During the Charging and Molding Cycle".

If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate to determine the hourly and daily emissions rates.

1.b Emission Limitation: 1.23 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A. III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 pounds/ton.

- 2.** Any determination of organic compound content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any thinner or viscosity reducer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #13 for fiberglass reinforced plastic parts		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene.

TLV (mg/m3): 85,000.

Maximum Hourly Emission Rate (lbs/hr): 13.61 for P005-P009, P013, P014 & P016-P024; and 1.49 for P025.

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 794 for P005-P009, P013, P014 & P016-P024; 1066 for P025; and 1860 for all styrene emissions units included in PTI 02-12229.

MAGLC (ug/m3): 2024 for all styrene emissions units included in PTI 02-12229.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press 14 (P018)
Activity Description: Press 14

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #14 for fiberglass reinforced plastic parts	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.1.2.a and A.1.2.b.
	OAC rule 3745-31-05(A)(3) PTI 02-12229	OC emissions shall not exceed 0.80 lb/hr, 19.3 lbs/day and 3.52 TPY.

2. Additional Terms and Conditions

- 2.a The hourly and daily emission limits based on this applicable rule are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic materials are comprised of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.
 - b. The total OC emission rate for all mold compounds employed, in pounds per day.
 - d. The total number of hours the emissions unit was in operation.
 - e. The average hourly OC emission rate for all mold compounds employed, i.e., c/d, in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the mold compounds exceeded 0.80 pound per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the mold compounds exceeded 19.3 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation: 0.80 lb OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions.

1.b Emission Limitation: 19.3 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds is based upon the following equation:

$E = \text{summation of } (W_i \times E_{foc}) \text{ for all mold compounds.}$

where the following applies:

E = total, daily, OC emissions, in pounds per day.

W_i = the weight of mold compound "i" employed, in pounds per day.

E_{foc} = the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene Emissions During the Charging and Molding Cycle".

If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate to determine the hourly and daily emissions rates.

1.c Emission Limitation: 3.52 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A.III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 pounds/ton.

2. Any determination of organic compound content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any thinner or viscosity reducer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #14 for fiberglass reinforced plastic parts		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene.

TLV (mg/m3): 85,000.

Maximum Hourly Emission Rate (lbs/hr): 13.61 for P005-P009, P013, P014 & P016-P024; and 1.49 for P025.

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 794 for P005-P009, P013, P014 & P016-P024; 1066 for P025; and 1860 for all styrene emissions units included in PTI 02-12229.

MAGLC (ug/m3): 2024 for all styrene emissions units included in PTI 02-12229.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press 15 (P019)
Activity Description: Press 15

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #15 for fiberglass reinforced plastic parts	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.1.2.a and A.1.2.b.
	OAC rule 3745-31-05(A)(3) PTI 02-12229	OC emissions shall not exceed 0.80 lb/hr, 19.3 lbs/day and 3.52 TPY.

2. Additional Terms and Conditions

- 2.a The hourly and daily emission limits based on this applicable rule are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic materials are comprised of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.
 - b. The total OC emission rate for all mold compounds employed, in pounds per day.
 - d. The total number of hours the emissions unit was in operation.
 - e. The average hourly OC emission rate for all mold compounds employed, i.e., c/d, in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the mold compounds exceeded 0.80 pound per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the mold compounds exceeded 19.3 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation: 0.80 lb OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions.

1.b Emission Limitation: 19.3 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds is based upon the following equation:

$E = \text{summation of } (W_i \times E_{foc}) \text{ for all mold compounds.}$

where the following applies:

$E = \text{total, daily, OC emissions, in pounds per day.}$

$W_i = \text{the weight of mold compound "i" employed, in pounds per day.}$

$E_{foc} = \text{the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene Emissions During the Charging and Molding Cycle".}$

If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate to determine the hourly and daily emissions rates.

1.c Emission Limitation: 3.52 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A.III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 pounds/ton.

2. Any determination of organic compound content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any thinner or viscosity reducer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---------------------------------------	--

Compression molding press #15 for fiberglass reinforced plastic parts

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene.

TLV (mg/m3): 85,000.

Maximum Hourly Emission Rate (lbs/hr): 13.61 for P005-P009, P013, P014 & P016-P024; and 1.49 for P025.

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 794 for P005-P009, P013, P014 & P016-P024; 1066 for P025; and 1860 for all styrene emissions units included in PTI 02-12229.

MAGLC (ug/m3): 2024 for all styrene emissions units included in PTI 02-12229.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press 16 (P020)
Activity Description: Press 16

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #16 for fiberglass reinforced plastic parts	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.1.2.a and A.1.2.b.
	OAC rule 3745-31-05(A)(3) PTI 02-12229	OC emissions shall not exceed 0.64 lb/hr, 15.4 lbs/day and 2.82 TPY.

2. Additional Terms and Conditions

- 2.a The hourly and daily emission limits based on this applicable rule are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic materials are comprised of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.
 - b. The total OC emission rate for all mold compounds employed, in pounds per day.
 - d. The total number of hours the emissions unit was in operation.
 - e. The average hourly OC emission rate for all mold compounds employed, i.e., c/d, in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the mold compounds exceeded 0.64 pound per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the mold compounds exceeded 15.4 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation: 0.64 lb OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions.

1.b Emission Limitation: 15.4 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds is based upon the following equation:

$E = \text{summation of } (W_i \times E_{foc}) \text{ for all mold compounds.}$

where the following applies:

$E = \text{total, daily, OC emissions, in pounds per day.}$

$W_i = \text{the weight of mold compound "i" employed, in pounds per day.}$

$E_{foc} = \text{the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene Emissions During the Charging and Molding Cycle".}$

If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate to determine the hourly and daily emissions rates.

1.c Emission Limitation: 2.82 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A.III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 pounds/ton.

2. Any determination of organic compound content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any thinner or viscosity reducer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #16 for fiberglass reinforced plastic parts		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene.

TLV (mg/m3): 85,000.

Maximum Hourly Emission Rate (lbs/hr): 13.61 for P005-P009, P013, P014 & P016-P024; and 1.49 for P025.

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 794 for P005-P009, P013, P014 & P016-P024; 1066 for P025; and 1860 for all styrene emissions units included in PTI 02-12229.

MAGLC (ug/m3): 2024 for all styrene emissions units included in PTI 02-12229.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press 17 (P021)

Activity Description: Press 17

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #17 for fiberglass reinforced plastic parts	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.1.2.a and A.1.2.b.
	OAC rule 3745-31-05(A)(3) PTI 02-12229	OC emissions shall not exceed 0.72 lb/hr, 17.4 lbs/day and 3.17 TPY.

2. Additional Terms and Conditions

- 2.a The hourly and daily emission limits based on this applicable rule are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic materials are comprised of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.
 - b. The total OC emission rate for all mold compounds employed, in pounds per day.
 - d. The total number of hours the emissions unit was in operation.
 - e. The average hourly OC emission rate for all mold compounds employed, i.e., c/d, in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the mold compounds exceeded 0.72 pound per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the mold compounds exceeded 17.4 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation: 0.72 lb OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions.

1.b Emission Limitation: 17.4 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds is based upon the following equation:

$E = \text{summation of } (W_i \times E_{foc}) \text{ for all mold compounds.}$

where the following applies:

$E = \text{total, daily, OC emissions, in pounds per day.}$

$W_i = \text{the weight of mold compound "i" employed, in pounds per day.}$

$E_{foc} = \text{the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene Emissions During the Charging and Molding Cycle".}$

If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate to determine the hourly and daily emissions rates.

1.c Emission Limitation: 3.17 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A.III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 pounds/ton.

2. Any determination of organic compound content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any thinner or viscosity reducer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

Compression molding press #17 for fiberglass reinforced plastic parts

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene.

TLV (mg/m3): 85,000.

Maximum Hourly Emission Rate (lbs/hr): 13.61 for P005-P009, P013, P014 & P016-P024; and 1.49 for P025.

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 794 for P005-P009, P013, P014 & P016-P024; 1066 for P025; and 1860 for all styrene emissions units included in PTI 02-12229.

MAGLC (ug/m3): 2024 for all styrene emissions units included in PTI 02-12229.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press 18 (P022)
Activity Description: Press 18

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #18 for fiberglass reinforced plastic parts	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.1.2.a and A.1.2.b.
	OAC rule 3745-31-05(A)(3) PTI 02-12229	OC emissions shall not exceed 0.80 lb/hr, 19.3 lbs/day and 3.52 TPY.

2. Additional Terms and Conditions

- 2.a The hourly and daily emission limits based on this applicable rule are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic materials are comprised of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.
 - c. The total OC emission rate for all mold compounds employed, in pounds per day.
 - d. The total number of hours the emissions unit was in operation.
 - e. The average hourly OC emission rate for all mold compounds employed, i.e., c/d, in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the mold compounds exceeded 0.80 pound per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the OC emissions from the mold compounds exceeded 19.3 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation: 0.80 lb OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions.

1.b Emission Limitation: 19.3 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds is based upon the following equation:

$E = \text{summation of } (W_i \times E_{foc}) \text{ for all mold compounds.}$

where the following applies:

$E = \text{total, daily, OC emissions, in pounds per day.}$

$W_i = \text{the weight of mold compound "i" employed, in pounds per day.}$

$E_{foc} = \text{the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene Emissions During the Charging and Molding Cycle".}$

If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate to determine the hourly and daily emissions rates.

1.c Emission Limitation: 3.52 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A.III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 pounds/ton.

2. Any determination of organic compound content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any thinner or viscosity reducer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

Compression molding press #18 for fiberglass reinforced plastic parts

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene.

TLV (mg/m3): 85,000.

Maximum Hourly Emission Rate (lbs/hr): 13.61 for P005-P009, P013, P014 & P016-P024; and 1.49 for P025.

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 794 for P005-P009, P013, P014 & P016-P024; 1066 for P025; and 1860 for all styrene emissions units included in PTI 02-12229.

MAGLC (ug/m3): 2024 for all styrene emissions units included in PTI 02-12229.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press 19 (P023)
Activity Description: Press 19

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #19 for fiberglass reinforced plastic parts	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.I.2.a. and A.I.2.b.
	OAC rule 3745-21-07(G)(9)(g)	OC emissions shall not exceed 42.5 lbs/day. See A.I.2.c. and A.I.2.d.
	OAC rule 3745-31-05(A)(3) PTI 02-12229	OC emissions shall not exceed 1.77 lbs/hr and 7.75 TPY. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(9)(g).

2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the daily OC emission limitation specified in OAC rule 3745-21-07(G)(2) because it meets the requirements specified in OAC rule 3745-21-07(G)(9)(g).
- 2.b The hourly emission limit based on this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The emissions of organic materials are comprised of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
- 2.d Only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding machine.

II. Operational Restrictions

1. The volatile organic compound (VOC) content of the each mold compound shall be no more than 17% (by weight), as applied.
2. The use of cleanup solvents, containing OC materials, is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - 1.a The company identification for each mold compound employed.

III. Monitoring and/or Record Keeping Requirements (continued)

- 1.b** The number of pounds of each mold compound employed.
- 1.c** The VOC content of each mold compound, as applied, in percent by weight.
- 1.d** The total OC emission rate for all mold compounds employed, in pounds per day.
- 1.e** The total number of hours the emissions unit was in operation.
- 1.f** The average hourly OC emission rate for all mold compounds employed, i.e., d/e, in pounds per hour (average).
- 2.** For each day during which the permittee employs a cleanup solvent, the permittee shall maintain a record of the following information:
 - a.** The company identification of each cleanup solvent employed.
 - b.** Whether or not each cleanup solvent contains any OC, and if so the OC content, in percent by weight, of the cleanup solvent employed and the number of pounds of each cleanup solvent employed.

IV. Reporting Requirements

- 1.** The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a.** An identification of each day during which the average hourly OC emissions from the mold compounds exceeded 1.77 pounds per hour, and the actual average hourly OC emissions for each such day.
 - b.** An identification of each day during which the OC emissions from the mold compounds exceeded 42.5 pounds per day, and the actual OC emissions for each such day.
 - c.** An identification of each day during which cleanup solvents, containing OC materials, were employed.
 - d.** An identification of each day during which the styrene content of any mold compound exceeded 17% (by weight), as applied.
- 2.** The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

- 1.** Compliance with the emissions limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a** Emission Limitation: 1.77 lbs OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions. If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate.

V. Testing Requirements (continued)

1.b Emission Limitation: 42.5 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds is based upon the following equation:

$E = \text{summation of } (W_i \times E_{Foc}) \text{ for all mold compounds.}$

where the following applies:

E = total, daily, OC emissions, in pounds per day.

W_i = the weight of mold compound "i" employed, in pounds per day.

E_{foc} = the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene Emissions During the Charging and Molding Cycle".

1.c Emission Limitation: 7.75 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A.III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 pounds/ton.

2. Any determination of volatile organic compound (VOC) content (percent by weight), solids content, or density of a mold compound shall be based on the mold compound as employed, including the addition of any monomer to the mold compound. The permittee shall determine the VOC content of the mold compound by using formulation data or U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA or U.S. EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA and U.S. EPA) performed on the mold compound(s).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #19 for fiberglass reinforced plastic parts		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene.

TLV (mg/m3): 85,000.

Maximum Hourly Emission Rate (lbs/hr): 13.61 for P005-P009, P013, P014 & P016-P024; and 1.49 for P025.

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 794 for P005-P009, P013, P014 & P016-P024; 1066 for P025; and 1860 for all styrene emissions units included in PTI 02-12229.

MAGLC (ug/m3): 2024 for all styrene emissions units included in PTI 02-12229.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press 20 (P024)

Activity Description: Press 20

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #20 for fiberglass reinforced plastic parts	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.I.2.a. and A.I.2.b.
	OAC rule 3745-21-07(G)(9)(g)	OC emissions shall not exceed 65.2 lbs/day. See A.I.2.c. and A.I.2.d.
	OAC rule 3745-31-05(A)(3) PTI 02-12229	OC emissions shall not exceed 2.72 lbs/hr and 11.90 TPY. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(9)(g).

2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the daily OC emission limitation specified in OAC rule 3745-21-07(G)(2) because it meets the requirements specified in OAC rule 3745-21-07(G)(9)(g).
- 2.b The hourly emission limit based on this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The emissions of organic materials are comprised of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
- 2.d Only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding machine.

II. Operational Restrictions

1. The volatile organic compound (VOC) content of the each mold compound shall be no more than 17% (by weight), as applied.
2. The use of cleanup solvents, containing OC materials, is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - 1.a The company identification for each mold compound employed.

III. Monitoring and/or Record Keeping Requirements (continued)

- 1.b** The number of pounds of each mold compound employed.
- 1.c** The VOC content of each mold compound, as applied, in percent by weight.
- 1.d** The total OC emission rate for all mold compounds employed, in pounds per day.
- 1.e** The total number of hours the emissions unit was in operation.
- 1.f** The average hourly OC emission rate for all mold compounds employed, i.e., d/e, in pounds per hour (average).
- 2.** For each day during which the permittee employs a cleanup solvent, the permittee shall maintain a record of the following information:
 - a.** The company identification of each cleanup solvent employed.
 - b.** Whether or not each cleanup solvent contains any OC, and if so the OC content, in percent by weight, of the cleanup solvent employed and the number of pounds of each cleanup solvent employed.

IV. Reporting Requirements

- 1.** The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a.** An identification of each day during which the average hourly OC emissions from the mold compounds exceeded 2.72 pounds per hour, and the actual average hourly OC emissions for each such day.
 - b.** An identification of each day during which the OC emissions from the mold compounds exceeded 65.2 pounds per day, and the actual OC emissions for each such day.
 - c.** An identification of each day during which cleanup solvents, containing OC materials, were employed.
 - d.** An identification of each day during which the styrene content of any mold compound exceeded 17% (by weight), as applied.
- 2.** The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

- 1.** Compliance with the emissions limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a** Emission Limitation: 2.72 lbs OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions. If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate.

V. Testing Requirements (continued)

1.b Emission Limitation: 65.2 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds is based upon the following equation:

$E = \text{summation of } (W_i \times E_{Foc}) \text{ for all mold compounds.}$

where the following applies:

$E = \text{total, daily, OC emissions, in pounds per day.}$

$W_i = \text{the weight of mold compound "i" employed, in pounds per day.}$

$E_{foc} = \text{the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene Emissions During the Charging and Molding Cycle".}$

1.c Emission Limitation: 11.90 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A.III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 pounds/ton.

- 2.** Any determination of volatile organic compound (VOC) content (percent by weight), solids content, or density of a mold compound shall be based on the mold compound as employed, including the addition of any monomer to the mold compound. The permittee shall determine the VOC content of the mold compound by using formulation data or U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA or U.S. EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA and U.S. EPA) performed on the mold compound(s).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

Compression molding press #20 for fiberglass reinforced plastic parts

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene.

TLV (mg/m3): 85,000.

Maximum Hourly Emission Rate (lbs/hr): 13.61 for P005-P009, P013, P014 & P016-P024; and 1.49 for P025.

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 794 for P005-P009, P013, P014 & P016-P024; 1066 for P025; and 1860 for all styrene emissions units included in PTI 02-12229.

MAGLC (ug/m3): 2024 for all styrene emissions units included in PTI 02-12229.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Jayco SMC Mixer (P025)

Activity Description: Jayco SMC Mixer

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Jayco mixer for polyester resin/styrene paste production with a baghouse (JAYCODC) to control dust	OAC rule 3745-17-07(A)	Visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 6-minute average, except as specified by rule. See A.1.2.a.
	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) shall not exceed 6.52 lbs/hr. See A.1.2.a.
	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.1.2.a and A.1.2.b.
	OAC rule 3745-31-05(A)(3) PTI 02-12229	Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average. PE shall not exceed 0.40 lb/hr and 1.75 TPY. OC emissions shall not exceed 1.49 lb/hr, 35.8 lbs/day and 6.53 tons/year.

2. Additional Terms and Conditions

- 2.a The emission limit(s) based on this applicable rule is (are) less stringent than the limit(s) established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic material are comprised of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

1. The pressure drop across the fabric filter shall be maintained within the range recommended by the manufacturer while the emissions unit is in operation.
2. The use of cleanup solvents, containing OC materials, is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a once per eight (8)-hour shift basis.
2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each mix manufactured.
 - b. The number of pounds of each mix manufactured.
 - c. The styrene content of each mix manufactured, in percent by weight.
 - d. The total OC emission rate for all mixes manufactured, in pounds per day.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly OC emission rate for all mixes manufactured, i. e., d/e, in pounds per hour (average).
3. For each day during which the permittee employs a cleanup solvent, the permittee shall maintain a record of the following information:
 - a. The company identification of each cleanup solvent employed.
 - b. Whether or not each cleanup solvent contains any OC, and if so the OC content, in percent by weight, of the cleanup solvent employed and the number of pounds of each cleanup solvent employed.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.1.
 - b. An identification of each day during which the average hourly OC emissions from the mold compounds exceeded 1.49 lb/hr, and the actual average hourly OC emissions for each such day.
 - c. An identification of each day during which the OC emissions from the mold compounds exceeded 35.8 lbs/day, and the actual OC emissions for each such day.
 - d. An identification of each day during which cleanup solvents, containing OC materials, were employed.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation: 5% opacity of visible particulate emissions
Applicable Compliance Method: Compliance shall be determined based upon OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

1.b Emission Limitation: 0.40 lb PE/hr

Applicable Compliance Method(s): To determine the actual worst case emission rate for particulate matter, the following equation may be used:

$$EH = P \times EF \times (1 - CE).$$

Where the following applies:
EH = PE, in pounds per hour.

P = maximum dry solids throughput rate, which is 4000 pounds per hour as noted in the permit application.

EF = emission factor for uncontrolled PE, which is 0.01 pounds of uncontrolled PE per pound of dry solids processed, as noted in section 6.4 of AP-42 chapter 6.4 (5/83).

CE = control efficiency of the PE control device, which is 99% as noted in the permit application.

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

1.c Emission Limitation: 1.75 TPY PE

Applicable Compliance Method: To determine the annual rate for PE, the actual, hourly, worst case emission rate as determined in section A.V.1.b. shall be multiplied by the actual hours of operation, and divided by 2000 lbs/ton.

1.d Emission Limitation: 1.49 lb OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.2. of these terms and conditions.

1.e Emission Limitation: 35.8 lbs OC/day

Applicable Compliance Methods: Compliance shall be determined based upon the following equation:

$$E(\text{mix}) = [\text{summation of } (W_i \times SC_i)] \times EF$$

Where the following applies:

E(mix) = total, daily, OC emissions from the mix operations, in pounds per day.

W_i = the weight of mix "i" employed, in pounds per day.

SC_i = the styrene content of mix "i", in percent by weight.

EF = the OC emission factor, in 0.000287 pound of OC emissions per pound of available styrene content, as determined from results of a U.S. EPA Method 25A test, conducted on September 27, 2001.

1.f Emission Limitation: 6.53 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A.III.2. of this permit and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 lbs/ton.

- 2.** Any determination of organic compound content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

Facility Name: **Bailey Transportation Products, Inc.**
Facility ID: **02-04-02-0245**
Emissions Unit: **Jayco SMC Mixer (P025)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Jayco mixer for polyester resin/styrene paste production with a baghouse (JAYCODC) to control dust		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene.

TLV (mg/m3): 85,000.

Maximum Hourly Emission Rate (lbs/hr): 13.61 for P005-P009, P013, P014 & P016-P024; and 1.49 for P025.

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 794 for P005-P009, P013, P014 & P016-P024; 1066 for P025; and 1860 for all styrene emissions units included in PTI 02-12229.

MAGLC (ug/m3): 2024 for all styrene emissions units included in PTI 02-12229.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press 21 (P026)
Activity Description: Press 21

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #21 for fiberglass reinforced plastic parts	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.1.2.a and A.1.2.b.
	OAC rule 3745-31-05(A)(3) PTI 02-13528	OC emissions shall not exceed 0.53 lb/hr, 12.7 lbs/day and 2.32 TPY.

2. Additional Terms and Conditions

- 2.a The hourly and daily emission limits based on this applicable rule are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic materials are comprised of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.
 - b. The total OC emission rate for all mold compounds employed, in pounds per day.
 - d. The total number of hours the emissions unit was in operation.
 - e. The average hourly OC emission rate for all mold compounds employed, i.e., c/d, in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the mold compounds exceeded 0.53 pound per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the mold compounds exceeded 12.7 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation: 0.53 lb OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions.

1.b Emission Limitation: 12.7 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A.III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds is based upon the following equation:

$E = \text{summation of } (W_i \times E_{foc}) \text{ for all mold compounds.}$

where the following applies:

$E = \text{total, daily, OC emissions, in pounds per day.}$

$W_i = \text{the weight of mold compound "i" employed, in pounds per day.}$

$E_{foc} = \text{the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene Emissions During the Charging and Molding Cycle".}$

If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate to determine the hourly and daily emissions rates.

1.c Emission Limitation: 1.20 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A.III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 pounds/ton.

2. Any determination of organic compound content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any thinner or viscosity reducer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #21 for fiberglass reinforced plastic parts		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model. The predicted 1-hour maximum ground-level concentration from the use of the ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene.

TLV (mg/m3): 85,000.

Maximum Hourly Emission Rate (lbs/hr): 0.53 for P026.

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1520 for all styrene emissions units (P026) included in PTI 02-13528.

MAGLC (ug/m3): 2024 for all styrene emissions units (P026) included in PTI 02-13528.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

THIS IS THE LAST PAGE OF THE PERMIT
