



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
ASHTABULA COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.
Center

Application No: 02-20176

Fac ID: 0204000423

DATE: 1/20/2005

Picken's Plastics, Inc. - Jefferson Plan
Dennis DeLaat
149 South Cucumber St.
Jefferson, OH 44047

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** will be due. Please do not submit any payment now.

The Ohio EPA is urging 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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

NEDO

Eastgate Dev. & Trans. Study

NY

PA

ASHTABULA COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 02-20176 FOR AN AIR CONTAMINANT SOURCE FOR
Picken's Plastics, Inc. - Jefferson Plan**

On 1/20/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Picken's Plastics, Inc. - Jefferson Plan**, located at **149 S. Cucumber St, Jefferson, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-20176:

Cold cleaner, 2 gelcoat booths.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087
[(330)425-9171]



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 02-20176

Application Number: 02-20176
Facility ID: 0204000423
Permit Fee: **To be entered upon final issuance**
Name of Facility: Picken's Plastics, Inc. - Jefferson Plan
Person to Contact: Dennis DeLaat
Address: 149 South Cucumber St.
Jefferson, OH 44047

Location of proposed air contaminant source(s) [emissions unit(s)]:
**149 S. Cucumber St
Jefferson, Ohio**

Description of proposed emissions unit(s):
Cold cleaner, 2 gelcoat booths.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

A. State and Federally Enforceable Permit To Install General Terms and Conditions**1. Monitoring and Related Recordkeeping 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.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - 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 recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. 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. See B.9 below if no deviations occurred during the quarter.

Picken's Plastics, Inc. - Jefferson Plan

Facility ID: 0204000423

PTI Application: 02-20176

Issued: To be entered upon final issuance

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, 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. 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.
- 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.

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, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

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

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.

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.

5. Severability Clause

Issued: To be entered upon final issuance

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.

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. 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.

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. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. 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.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- 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 ORC section 3704.08.
 - 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.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

Picken's Plastics, Inc. - Jefferson Plan

Facility ID: 0204000423

PTI Application: 02-20176

Issued: To be entered upon final issuance

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

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

Picken's Plastics, Inc. - Jefferson Plan

Facility ID: 0204000423

PTI Application: 02-20176

Issued: To be entered upon final issuance

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the 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 state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the 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.)

3. 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.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

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

7. Applicability

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

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally

Picken's Plastics, Inc. - Jefferson Plan

Facility ID: 0204000423

PTI Application: 02-20176

Issued: To be entered upon final issuance

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.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	21.9
Acetone	16.0

12

Picken's Plastics, Inc. - Jefferson Plan

PTI Application: 02-20176

Issued: To be entered upon final issuance

Facility ID: 0204000423

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

1. § 63.5905 What notifications must I submit and when

- (a) You must submit all of the notifications in Table 13 to this subpart that apply to you by the dates specified in Table 13 to this subpart. The notifications are described more fully in 40 CFR part 63, subpart A, referenced in Table 13 to this subpart.
- (b) If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change.

2. § 63.5910 What reports must I submit and when?

- (a) You must submit each report in Table 14 to this subpart that applies to you.
- (b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the date specified in Table 14 to this subpart and according to paragraphs (b)(1) through (5) of this section.
 - (1) The first compliance report must cover the period beginning on the compliance date that is specified for your affected source in §63.5800 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in §63.5800.
 - (2) The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for your affected source in §63.5800.
 - (3) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
 - (4) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
 - (5) For each affected source that is subject to permitting requirements pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to §70.6 (a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section.

Picken's Plastics, Inc. - Jefferson Plan

PTI Application: 02-20176

Issued: To be entered upon final issuance

Facility ID: 0204000423

Issued: To be entered upon final issuance

- (c) The compliance report must contain the information in paragraphs (c)(1) through (6) of this section:
- (1) Company name and address.
 - (2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
 - (3) Date of the report and beginning and ending dates of the reporting period.
 - (4) If you had a startup, shutdown, or malfunction during the reporting period and you took actions consistent with your startup, shutdown, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i).
 - (5) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, and there are no deviations from the requirements for work practice standards in Table 4 to this subpart, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.
 - (6) If there were no periods during which the continuous monitoring system (CMS), including a continuous emissions monitoring system (CEMS) and an operating parameter monitoring system were out of control, as specified in §63.8(c)(7), a statement that there were no periods during which the CMS was out of control during the reporting period.
- (d) For each deviation from a organic HAP emissions limitation (*i.e.*, emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source where you are not using a CMS to comply with the organic HAP emissions limitations or work practice standards in this subpart, the compliance report must contain the information in paragraphs (c)(1) through (4) of this section and in paragraphs (d)(1) and (2) of this section. This includes periods of startup, shutdown, and malfunction.
- (1) The total operating time of each affected source during the reporting period.
 - (2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
- (e) For each deviation from a organic HAP emissions limitation (*i.e.*, emissions limit and operating limit) occurring at an affected source where you are using a CMS to comply with the organic HAP emissions limitation in this subpart, you must include the information in paragraphs (c)(1) through (4) of this section and in paragraphs (e)(1) through (12) of this section. This includes

Picken's Plastics, Inc. - Jefferson Plan

Facility ID: 0204000423

PTI Application: 02-20176

Issued: To be entered upon final issuance

periods of startup, shutdown, and malfunction.

- (1) The date and time that each malfunction started and stopped.
 - (2) The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks.
 - (3) The date, time, and duration that each CMS was out of control, including the information in §63.8(c)(8).
 - (4) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction, or during another period.
 - (5) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.
 - (6) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.
 - (7) A summary of the total duration of CMS downtime during the reporting period and the total duration of CMS downtime as a percent of the total source operating time during that reporting period.
 - (8) An identification of each organic HAP that was monitored at the affected source.
 - (9) A brief description of the process units.
 - (10) A brief description of the CMS.
 - (11) The date of the latest CMS certification or audit.
 - (12) A description of any changes in CMS, processes, or controls since the last reporting period.
- (f) You must report if you have exceeded the 100 tpy organic HAP emissions threshold if that exceedance would make your facility subject to §63.5805(b) or (d). Include with this report any request for an exemption under §63.5805(e). If you receive an exemption under §63.5805(e) and subsequently exceed the 100 tpy organic HAP emissions threshold, you must report this exceedance as required in §63.5805(f).

- (g) Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 to this subpart along with, or as part of, the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.
- (h) Submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in Table 14 to this subpart, and not based on the requirements in §63.999.

3. §63.5915 What records must I keep?

- (a) You must keep the records listed in paragraphs (a)(1) through (3) of this section.
 - (1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirements in §63.10(b)(2)(xiv).
 - (2) The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.
 - (3) Records of performance tests, design, and performance evaluations as required in §63.10(b)(2).
- (b) If you use an add-on control device, you must keep all records required in 40 CFR part 63, subpart SS, to show continuous compliance with this subpart.
- (c) You must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3, 5, and 7 to this subpart.
- (d) You must keep a certified statement that you are in compliance with the work practice requirements in Table 4 to this subpart, as applicable.
- (e) For a new or existing continuous lamination/casting operation, you must keep the records listed in paragraphs (e)(1) through (4) of this section, when complying with the percent reduction and/or lbs/ton requirements specified in paragraphs (a) through (d) of §63.5805.
 - (1) You must keep all data, assumptions, and calculations used to determine percent reduction and/or lbs/ton as applicable;
 - (2) You must keep a brief description of the rationale for the assignment of an equation or factor to each formula;

Issued: To be entered upon final issuance

- (3) When using facility-specific organic HAP emissions estimation equations or factors, you must keep all data, assumptions, and calculations used to derive the organic HAP emissions estimation equations and factors and identification and rationale for the worst-case formula; and
- (4) For all organic HAP emissions estimation equations and organic HAP emissions factors, you must keep documentation that the appropriate permitting authority has approved them.

19

Picken's Plastics, Inc. - Jefferson Plan

PTI Application: 02-20176

Issued: To be entered upon final issuance

Facility ID: 0204000423

Issued: To be entered upon final issuance**4. § 63.5920 In what form and how long must I keep my records?**

- (a) You must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1).
- (b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- (c) You must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). You can keep the records offsite for the remaining 3 years.
- (d) You may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

5. § 63.5925 What parts of the General Provisions apply to me?

Table 15 to this subpart shows which parts of the General Provisions in §§63.1 through 63.15 apply to you.

Table 13 to Subpart WWW of Part 63

Applicability and Timing of Notifications [As required in Sec. 63.5905(a), you must determine the applicable notifications and submit them by the dates shown in the following table:]

If your facility . . .	You must submit. . .	By this date . . .
1. Is an existing source subject to this subpart.	An Initial Notification containing the information specified in Sec. 63.9 (b) (2).	No later than the dates specified in Sec. 63.9 (b) (2).
2. Is a new source subject to this subpart.	The notifications specified in Sec. 63.9 (b) (4) and (5).	No later than the dates specified in Sec. 63.9 (b) (4) and (5).
3. Qualifies for a compliance extension as specified in Sec. 63.9(c).	A request for a compliance extension as specified in Sec. 63.9 (c).	No later than the dates specified in Sec. 63.6 (i).
4. Is complying with organic HAP emissions limit averaging provisions.	A Notification of Compliance Status as specified in Sec. 63.9 (h).	No later than 1 year plus 30 days after your facility's compliance date.
5. Is complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging.	A Notification of Compliance Status as specified in Sec. 63.9 (h).	No later than 30 days after your facility's compliance date.
6. Is complying by using an add-on control device.	a. A notification of intent to conduct a performance test as specified in Sec. 63.9 (e).	No later than the date specified in Sec. 63.9 (e).

Picken's Plastics, Inc. - Jefferson Plan

Facility ID: 0204000423

PTI Application: 02-20176

Issued: To be entered upon final issuance

	b. A Notification for the date for the CMS performance evaluation as specified in Sec. 63.9 (g).	The date of submission of notification of intent to conduct a performance test.
	c. A Notification of Compliance Status as specified in Sec. 63.9 (h).	No later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation. November 19, 2004

Table 14 to Subpart WWW of Part 63.

Requirements for Reports [As required in Sec. 63.5910(a), (b), (g), and (h), you must submit reports on the schedule shown in the following table:]

You must submit a(n)	The report must contain . . .	You must submit the report. . .
1. Compliance report. . .	a. A statement that there were no deviations during that reporting period if there were any deviations from any emissions limitations (emission limit, operating limit, capacity limit, and visible emission limit) that apply to you and there were no deviations from the requirements for work practice standards in Table 4 to this subpart that apply to you. If there were no periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control as specified in Sec. 63.8(c)(7), the report must also contain a statement that there were no periods during which the CMS was out of control during the reporting period.	Semiannually according to the requirements in Sec. 63.5910 (b).
	b. The information in Sec. 63.5910 (d) if you have a deviation from any emission limitation (emission limit, operating limit, or work practice standard) during the reporting period. If there were periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control, as specified in Sec. 63.8(c)(7), the report must contain the information in Sec. 63.5910(e).	Semiannually according to the requirements in Sec. 63.5910 (b).

Picken's Plastics, Inc. - Jefferson Plan

Facility ID: 0204000423

PTI Application: 02-20176

Issued: To be entered upon final issuance

	c. The information in Sec. 63.10 (d) (5) (i) if you had a startup, malfunction or shutdown during the reporting period, and you took actions consistent with your startup, shutdown and malfunction plan.	Semiannually according to the requirements in Sec. 63.5910 (b)
2. An immediate startup, shutdown, and malfunction report if you had a startup, shutdown, or malfunction during the reporting period that is not consistent with actions your startup, shutdown, and malfunction plan.	a. Actions taken for the event	By fax or telephone within 2 working days after starting actions inconsistent with the plan
	b. The information in Sec. 63.10(d)(5)(ii).	By letter within 7 working days after the end of the event unless you have made alternative arrangements with the permitting authority. (Sec. 63.10(d)(5)(ii)).

Table 14 to Subpart WWWW of Part 63.

Requirements for Reports [As required in Sec. 63.5910(a), (b), (g), and (h), you must submit reports on the schedule shown in the following table:]

The general provisions reference. . .	That addresses. . .	And applies to subpart WWWW of part 63	Subject to the following additional information. . .
Sec. 63.1 (a)(1)	General applicability of the general provisions	Yes. . .	Additional terms defined in subpart WWWW of part 63, when overlap between parts A and WWWW of Part 63 of this part, subpart WWWW of Part 63 takes precedence.
Sec. 63.1 (a) (2) - (4)	General applicability of the general provisions	Yes. . .	
Sec. 63.1 (a) (5)	reserved	No. . .	
Sec. 63.1 (a) (6)	General applicability of the general provisions	Yes. . .	
Sec. 63.1 (a) (7) - (9)	reserved	No. . .	
Sec. 63.1 (a) (10) - (14)	General applicability of the general provisions	Yes. . .	

Sec. 63.1 (b) (1)	Initial applicability determination	Yes. . .	Subpart WWWW of Part 63 clarifies the applicability of Sec.63.5780 and 63.5785.
Sec. 63.1 (b) (2)	reserved	No. . .	
Sec. 63.1 (b) (3)	Record of the applicability determination	Yes. . .	
Sec. 63.1 (c) (1)	Applicability of this part after a relevant standard has been set under this part	Yes. . .	Subpart WWWW of Part 63 clarifies the applicability of each paragraph of subpart A to sources subject to subpart WWWW of Part 63.
Sec. 63.1 (c) (2)	Title V operating permit requirement	Yes. . .	All major affected sources are required to obtain a title V operating permit. Area sources are not subject to subpart WWWW of Part 63.
Sec. 63.1 (c) (3) and (4)	reserved	No. . .	
Sec. 63.1 (c) (5)	Notification requirements for an area source that increases HAP emissions to major source levels.	Yes. . .	
Sec. 63.1 (d)	reserved	No. . .	
Sec. 63.1 (e)	Applicability of a permit program before a relevant standard has been set under this part.	Yes. . .	
Sec. 63.2	Definitions	Yes. . .	Subpart WWWW of Part 63 defines terms in Sec. 63.5935. When overlap between subparts A and WWWW of Part 63 occurs, you must comply with the subpart WWWW of Part 63 definitions, which take precedence over the subpart A definitions.
Sec. 63.3	Units and abbreviations	Yes. . .	Other units and abbreviations used in subpart WWWW of Part 63 are defined in subpart WWWW of Part 63.
Sec. 63.4	Prohibited activities and circumvention	Yes. . .	Sec. 63.4 (a)(3) through (5) is reserved and does not apply.
Sec. 63.5 (a) (1) and (2)	Applicability of construction and reconstruction.	Yes. . .	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
Sec. 63.5 (b) (1)	Relevant standards for new sources upon construction.	Yes. . .	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
Sec. 63.5 (b) (2)	reserved	No. . .	
Sec. 63.5 (b) (3)	New construction/reconstruction	Yes. . .	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
Sec. 63.5 (b) (4)	Construction/reconstruction notification	Yes. . .	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
Sec. 63.5 (b) (5)	reserved	No. . .	

Picken's Plastics, Inc. - Jefferson Plan

Facility ID: 0204000423

PTI Application: 02-20176

Issued: To be entered upon final issuance

Sec. 63.5 (b) (6)	Equipment addition or process change.	Yes. . .	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
Sec. 63.5 (c)	reserved	No. . .	
Sec. 63.5 (d) (1)	General application for approval of construction or reconstruction.	Yes. . .	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
Sec. 63.5 (d) (2)	Application for approval of construction	Yes. . .	
Sec. 63.5 (d) (3)	Application for approval of reconstruction	No. . .	
Sec. 63.5 (d) (4)	Additional information	Yes. . .	
Sec. 63.5 (e) (1) - (5)	Approval of construction or reconstruction	Yes. . .	
Sec. 63.5 (f) (1) and (2)	Approval of construction or reconstruction based upon prior State preconstruction review.	Yes. . .	
Sec. 63.6 (a) (1)	Applicability of compliance with standards and maintenance requirements.	Yes. . .	
Sec. 63.6 (a) (2)	Applicability of area sources that increase HAP emissions to become major sources.	Yes. . .	
Sec. 63.6 (b) (1) - (5)	Compliance dates for new and reconstructed sources.	Yes. . .	Subpart WWWW of Part 63 clarifies compliance dates in Sec. 63.5800.
Sec. 63.6 (b) (6)	reserved	No. . .	
Sec. 63.6 (b) (7)	Compliance dates for new operations or equipment that cause an area source to become a major source.	Yes. . .	New operations at an existing facility are not subject to new source standards.
Sec. 63.6 (c) (1) and (2)	Compliance dates for existing sources.	Yes. . .	Subpart WWWW of Part 63 clarifies compliance dates in Sec. 63.5800.
Sec. 63.6 (c) (3) and (4)	reserved	No. . .	
Sec. 63.6 (c) (5)	Compliance dates for existing area sources that become major.	Yes. . .	Subpart WWWW of Part 63 clarifies compliance dates in Sec. 63.5800.
Sec. 63.6 (d)	reserved	No. . .	
Sec. 63.6 (e) (1) and (2)	Operation & Maintenance requirements	Yes. . .	
Sec. 63.6 (e) (3)	Startup, shutdown and malfunction plan and record keeping	Yes. . .	Subpart WWWW of Part 63 requires a startup, shutdown and malfunction plan only for sources using add-on controls.

Sec. 63.6 (f) (1)	Compliance except for periods of startup, shutdown and malfunction.	No. . .	Subpart WWW of Part 63 requires compliance during periods of startup, shutdown and malfunction except startup, shutdown and malfunctions for sources using add-on controls.
Sec. 63.6 (f) (2) and (3)	Methods for determining compliance.	Yes. . .	
Sec. 63.6 (g) (1) - (3)	Alternative standard.	Yes. . .	
Sec. 63.6 (h)	Opacity and visible emission Standards.	No. . .	Subpart WWW of Part 63 does not contain opacity or visible emission standards.
Sec. 63.6 (i) (1) - (14)	Compliance extensions	Yes. . .	
Sec. 63.6 (i) (15)	reserved	No. . .	
Sec. 63.6 (i) (16)	Presidential compliance exemption	Yes. . .	
Sec. 63.7 (a) (1)	Applicability of performance testing requirements	Yes.	
Sec. 63.7 (a) (2)	Performance test dates	No.	Subpart WWW of Part 63 initial compliance requirements are in Sec. 63.5840.
Sec. 63.7 (a) (3)	CAA Section 114 authority	Yes.	
Sec. 63.7 (b) (1)	Notification of performance test	Yes.	
Sec. 63.7 (c)	Quality assurance program, including test plan.	Yes.	Except that the test plan must be submitted with the notification of the performance test.
Sec. 63.7 (d)	Performance testing facilities	Yes.	
Sec. 63.7 (e)	Conditions for conducting performance tests	Yes	Performance test requirements are contained in Sec. 63.5850. Additional requirements for performing compliance tests for continuous lamination/casting are included in Sec. 63.5870.
Sec. 63.7 (f)	Use of alternative test method.	Yes.	
Sec. 63.7 (g)	Performance test data analysis, record keeping, and reporting.	Yes.	
Sec. 63.7 (h)	Waiver of performance tests	Yes	
Sec. 63.8 (a) (1) and (2)	Applicability of monitoring requirements	Yes.	
Sec. 63.8 (a) (3)	reserved	No	
Sec. 63.8 (a) (4)	Monitoring requirements when using flares	Yes	
Sec. 63.8 (b) (1)	Conduct of monitoring exceptions	Yes	
Sec. 63.8 (b) (2) and (3)	Multiple effluents and multiple monitoring systems	Yes	
Sec 63.8 (c) (1)	Compliance with CMS operation and maintenance requirements	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.

Picken's Plastics, Inc. - Jefferson Plan

Facility ID: 0204000423

PTI Application: 02-20176

Issued: To be entered upon final issuance

Sec. 63.8 (c) (2) and (3)	Monitoring system installation	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8 (c) (4)	CMS requirements.	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8 (c) (5)	Continuous opacity monitoring systems (COMS) minimum procedures	No	Subpart WWWW of Part 63 does not contain opacity standards.
Sec. 63.8 (c) (6) - (8)	CMS calibration and periods CMS is out of control	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8 (d)	CMS quality control program, including test plan and all previous versions	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8 (e) (1)	Performance evaluation of CMS	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8 (e) (2)	Notification of performance evaluation	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8 (e) (3) and (4)	CMS requirements/alternatives	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8 (e) (5)(i)	Reporting performance evaluation results	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8 (e) (5) (ii)	Results of COMS evaluation	No	Subpart WWWW of Part 63 does not contain opacity standards
Sec. 63.8 (f) (1) - (3)	Use of an alternative monitoring method	Yes	
Sec. 63.8 (f) (4)	Request to use an alternative monitoring method	Yes	
Sec. 63.8 (f) (5)	Approval of request to use an alternative monitoring method	Yes	
Sec. 63.8 (f) (6)	Request for alternative to relative accuracy test and associated records.	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8 (g) (1) - (5)	Data reduction	Yes	
Sec. 63.9 (a) (1) - (4)	Notification requirements and general information	Yes	
Sec. 63.9 (b) (1)	Initial notification applicability	Yes	
Sec. 63.9 (b) (2)	Notification for affected source with initial startup before effective date of standard	Yes	

Sec. 63.9 (b) (3)	reserved	No	
Sec. 63.9 (b) (4) (i)	Notification for a new or reconstructed major affected source with initial startup after effective date for which an application for approval of construction or reconstruction is required.	Yes	
Sec. 63.9 (b) (4) (ii) - (iv)	reserved	No	
Sec. 63.9 (b) (4) (v)	Notification for a new or reconstructed major affected source with initial startup after effective date for which an application for approval of construction or reconstruction is required.	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
Sec. 63.9 (b) (5)	Notification that you are subject to this subpart for new or reconstructed affected source with initial startup after effective date and for which an application for approval of construction or reconstruction is required.	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
Sec. 63.9 (c)	Request for extension compliance	Yes	
Sec. 63.9 (d)	Notification of special compliance requirements for new source.	Yes	
Sec. 63.9 (e)	Notification of performance test	Yes	
Sec. 63.9 (f)	Notification of opacity and visible emissions observations	No	Subpart WWWW of Part 63 does not contain opacity or visible emission standards
Sec. 63.9 (g) (1)	Additional notification requirements for sources using CMS.	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.9 (g) (2)	Notification of compliance with opacity emission standard.	No	Subpart WWWW of Part 63 does not contain opacity or visible emission standards
Sec. 63.9 (g) (3)	Notification that criterion to continue use of alternative to relative accuracy testing has been exceeded.	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.9 (h) (1) - (3)	Notification of compliance status.	Yes	
Sec. 63.9 (h) (4)	reserved	No	
Sec. 63.9 (h) (5) and (6)	Notification of compliance status	Yes	
Sec. 63.9 (i)	Adjustment of submittal deadlines	Yes	
Sec. 63.9 (j)	Change in information provided	Yes	
Sec. 63.10 (a)	Applicability of record keeping and reporting	Yes	
Sec. 63.10 (b) (1)	Records retention	Yes	

Issued: To be entered upon final issuance

Sec. 63.10 (b) (2) (i) - (v)	Records related to startup, shutdown and malfunction	Yes	Only applies to facilities that use an add-on control device
Sec. 63.10 (b) (2) (vi) - (xi)	CMS records, data on performance tests, CMS performance evaluations, measurements necessary to determine conditions of performance tests, and performance evaluations.	Yes	
Sec. 63.10 (b) (2) (xii)	Record of waiver of record keeping and reporting.	Yes	
Sec. 63.10 (b) (2) (xiii)	Record for alternative to the relative accuracy test	Yes	
Sec. 63.10 (b) (2) (xiv)	Records supporting initial notification and notification of compliance status.	Yes	
Sec. 63.10 (b) (3)	Records for applicability determinations	Yes	
Sec. 63.10 (c) (1)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.10 (c) (2) - (4)	reserved	No	
Sec. 63.10 (c) (5) - (8)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.10 (c) (9)	reserved	No	
Sec. 63.10 (c) (10) - (15)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.10 (d) (1)	General reporting requirements	Yes	
Sec. 63.10 (d) (2)	Report of performance test results	Yes	
Sec. 63.10(d) (3)	Reporting results of opacity or visible emission observations	No	Subpart WWWW of Part 63 does not contain opacity or visible emission standards.
Sec. 63.10 (d) (4)	Progress reports as part of extension of compliance.	Yes	
Sec. 63.10(d) (5)	Startup, shutdown and malfunction reports	Yes	Only applies if you use add-on control device.
Sec. 63.10 (e) (1) - (3)	Additional reporting requirements for CEMS	Yes	This section applies if you have an add-on control device and elect to use a CEM to demonstrate continuous compliance with an emission limit.

Picken's Plastics, Inc. - Jefferson Plan

PTI Application: 02-20176

Facility ID: 0204000423

Issued

Emissions Unit ID: P902

Sec. 63.10 (e) (4)	Reporting COMS data	No	Subpart WWWW of Part 63 does not contain opacity standards.
Sec. 63.10 (f)	Waiver for record keeping or reporting	Yes	
Sec. 63.11	Control device requirements	Yes	Only applies if you elect to use a flare as a control device.
Sec. 63.12	State authority and delegations	Yes	
Sec. 63.13	Addresses of State air pollution control agencies and EPA Regional Offices	Yes	
Sec. 63.14	Incorporations by reference	Yes	
Sec. 63.15	Availability of information and confidentiality.	Yes	

6. Emissions units P902 and R018 of this permit will comply with the applicable provisions of subpart WWWW of Part 63 upon startup. Emissions units R016 and R017 of this permit are existing under the MACT rules and shall comply with the provisions of subpart WWWW of part 63 accordingly, by April 21, 2006.

30

Picken's Plastics, Inc. - Jefferson Plan

PTI Application: 02-20176

Issued: To be entered upon final issuance

Facility ID: 0204000423

31

Picker

PTI A

Emissions Unit ID: P902

Issued: To be entered upon final issuance

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Picker

PTI A

Emissions Unit ID: P902

Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
P902 - Acetone rag wipe of product, equipment, fixtures, and work area surfaces and gun cleaning throughout the facility.	OAC rule 3745-31-05 (A)(3) 40 CFR 63.5780 Subpart WWWW	2667 lbs acetone/month and 16.0 tons per year See A.II.1. The requirements established pursuant to 40 CFR 63.5780, Subpart WWWW, are less restrictive than the requirements established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

1. The permittee shall employ only acetone on the rag wipes used to clean product, equipment, fixtures, and work area surfaces. The buckets containing the acetone shall remain covered except when in use. The use of soap and water or any other material not included in the definition of an air pollutant shall be exempt from this requirement.

Issued: To be entered upon final issuance**III. Monitoring and/or Record keeping Requirements**

1. The permittee shall make a record of any month during which an organic compound other than acetone was used for the rag wipes or gun cleaning. The record shall include an identification of the organic compound employed and the number of pounds of said organic compound employed.
2. The permittee shall collect and record the number of gallons of acetone employed each month. The permittee shall also collect and record the number of gallons of acetone recovered and sent for reuse or disposal. These records shall be maintained at the facility at all times and be made available to the Director or any authorized representative of the Director upon request.
3. Within 10 days of the end of each month, the permittee shall calculate the number of pounds of acetone emitted for that month. The calculation shall be performed by subtracting the number of gallons of acetone employed that month by the gallons of acetone recovered, as recorded in A.III.2. then multiplying the result by the weight of a gallon of acetone, which is 6.64 pounds. This calculation shall be maintained at the facility at all times and be made available to the Director or any authorized representative of the Director upon request.
4. The permittee shall calculate the number of tons of acetone employed each year. This calculation shall be performed by summing the pounds of acetone used each month, as recorded in A.III.3. for each month of the year and dividing by 1 ton/2000 pounds. This calculation shall be maintained at the facility at all times and shall be made available to the Director or any authorized representative of the Director upon request.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any month an organic compound other than acetone was used for the rag wipes and gun cleaning and shall include an identification of the organic compound employed and the amount, in pounds, of said compound employed.
2. The permittee shall submit deviation (excursion) reports which include an identification of each month when the total organic compound emissions exceeded 2667 pounds, and the actual organic compound emissions for each such month.
3. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c of this permit.

Issued

Emissions Unit ID: P902

4. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year and shall include the actual tons of acetone employed and the allowable tons of acetone (16.0 tons).

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation
2667 pounds acetone per month

Applicable Compliance Method
Compliance shall be determined based upon the record keeping specified in A.III.3.
 - b. Emission Limitation
16.0 tons acetone per year

Applicable Compliance Method
Compliance shall be determined based upon the record keeping specified in A.III.4.

VI. Miscellaneous Requirements

None

Picker

PTI A

Emissions Unit ID: P902

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
P902 - Acetone rag wipe of product, equipment, fixtures, and work area surfaces and gun cleaning throughout the facility.	OAC rule 3745-31-05	LIMIT(s)

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

36

Picker

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: P902

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Picker

PTI A

Emissions Unit ID: R017

Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
R016 - Gelcoat and Chop/Mat Layup Booth	OAC rule 3745-31-05 (A) (3)	7.3 tons VOC per year See A.2.a.
	OAC rule 3745-21-07 (G)(2)	8 pounds VOC per hour and 40 pounds per day

2. Additional Terms and Conditions

- 2.a Cleanup emissions for this emissions unit are included in emissions unit P902.

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day.
 - a. The identification of each gelcoat and each resin employed.
 - b. The amount of each gelcoat and resin employed, in pounds.
 - c. The number of hours gelcoat was employed.
 - d. The number of hours resin was employed.

The above information shall be collected and recorded on a daily basis. The information shall be retained at the facility and be made available to the Director or any authorized representative of the Director upon request during normal operating hours.

2. The permittee shall collect and record the following information for each day as preparation for the MACT standard WWWW in 40 CFR, Part 60 for which the first substantial compliance date is April 21, 2006.
 - a. The applicable emission factor for each gelcoat and resin employed shall be calculated according to Table 1 of subpart WWWW of 40 CFR Part 63.
 - b. The actual daily HAP and VOC emissions shall be calculated based upon the emission factor calculated in III.3.a. and the information collected in III.2.
 - c. The average hourly HAP and VOC emissions shall be determined based upon the daily emissions calculated in III.3.c. and the information collected in III.2.
 - d. The annual HAP and VOC emissions shall be determined by summing the daily emissions as determined in III.3.b.

NOTE: In this emissions unit, all the VOC are HAP and all the HAP are VOC.

The permittee may collect and record the daily information specified in III.2. and wait until the end of the calendar month to perform the calculations requested. All information must be determined and recorded by the 10th day of the following month, as a minimum. It shall not be a violation of this permit to determine this information on a more frequent basis. A copy of all information collected, all calculations, and all assumptions used must be retained at the facility and be made available to the Director or any authorized representative of the Director upon request. Although the Director allows the permittee to perform the required calculations on a monthly basis, the permittee is responsible for operating in compliance with all requirements of this permit at all times.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify the following:
 - a. all exceedances of the daily mass emission limitation for VOC of 40 pounds; and
 - b. all exceedances of the average hourly mass emission limitations for VOC of 8 pounds.

V. Testing Requirements

1. Compliance with the emission limitations/usage restrictions of this permit shall be determined in

Picker**PTI A**

Emissions Unit ID: R017

Issued: To be entered upon final issuance

accordance with the following compliance methods:

- a. Emission Limitation: 40 pounds VOC per day
Applicable Compliance Method: Compliance shall be demonstrated by the record keeping requirements specified in section A.III.3 of this permit.
- b. Emission Limitation: 8 pounds VOC per hour
Applicable Compliance Method: Compliance shall be demonstrated by the record keeping requirements specified in section A.III.3 of this permit.
- c. Emission Limitation: 7.3 tons VOC per year
Applicable Compliance Method: Compliance shall be demonstrated by the record keeping requirements specified in section A.III.3 of this permit.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
R016 - Gelcoat and Chop/Mat Layup Booth		

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

1. The permit to install for emissions units R016 and R017 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 over 1 ton per year, by this emissions unit, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:
Pollutant: Styrene
TLV: 85.202 mg/m³
Maximum Hourly Emission Rate: 16.0 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 0.0102 ug/m³
MAGLC : 2,030 ug/m³
2. 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

Issued: To be entered upon final issuance

in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used, 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.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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.

IV. Reporting Requirements

None

V. Testing Requirements

Picken's Plastics, Inc. - Jefferson Plan
PTI Application: 02-20176
Issued

Facility ID: 0204000423

None

Emissions Unit ID: R017

VI. Miscellaneous Requirements

None

**Picker
PTI A**

Emissions Unit ID: R017

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
R017 - Gelcoat and Chop/Mat Layup Booth	OAC rule 3745-31-05 (A)(3)	7.3 tons VOC per year See A.2.a.
	OAC rule 3745-21-07 (G)(2)	8 pounds VOC per hour and 40 pounds per day

2. Additional Terms and Conditions

- 2.a Clean up emissions for this emissions unit are included in emissions unit P902.

II. Operational Restrictions

None.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain daily records that document any periods when the dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information each day:

Issued: To be entered upon final issuance

- a. The identification of each gelcoat and each resin employed.
- b. The amount of each gelcoat and resin employed, in pounds.
- c. The number of hours gelcoat was employed.
- d. The number of hours resin was employed.

The above information shall be collected and recorded on a daily basis. The information shall be retained at the facility and be made available to the Director or any authorized representative of the Director upon request during normal operating hours.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify the following:
 - a. all exceedances of the daily mass emission limitation for VOC of 40 pounds; and
 - b. all exceedances of the average hourly mass emission limitations for VOC of 8 pounds.

V. Testing Requirements

1. Compliance with the emission limitations/usage restrictions of this permit shall be determined in accordance with the following compliance methods:
 - a. Emission Limitation: 40 pounds VOC per day
Applicable Compliance Method: Compliance shall be demonstrated by the record keeping requirements specified in section A.III.3 of this permit.
 - b. Emission Limitation: 8 pounds VOC per hour
Applicable Compliance Method: Compliance shall be demonstrated by the record keeping requirements specified in section A.III.3 of this permit.

45

Picker

PTI A

Emissions Unit ID: R017

Issued: To be entered upon final issuance

- c. Emission Limitation: 7.3 tons VOC per year
Applicable Compliance Method: Compliance shall be demonstrated by the record keeping requirements specified in section A.III.3 of this permit.

VI. Miscellaneous Requirements

None

Picker
PTI A

Emissions Unit ID: R017

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
R017 - Gelcoat and Chop/Mat Layup Booth		

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

1. The permit to install for emissions units R016 and R017 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 over 1 ton per year, by this emissions unit, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:
 Pollutant: Styrene
 TLV: 85.202 mg/m3
 Maximum Hourly Emission Rate: 16.0 lbs/hr
 Predicted 1-Hour Maximum Ground-Level Concentration: 0.0102 ug/m3
 MAGLC : 2,030 ug/m3
2. Physical changes to or changes in the method of operation of the emissions unit after its

Emissions Unit ID: R017

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, 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.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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.

IV. Reporting Requirements

None

V. Testing Requirements

48

Picker

PTI A

Issued: To be entered upon final issuance

None

Emissions Unit ID: R017

VI. Miscellaneous Requirements

None

**Picker
PTI A**

Emissions Unit ID: R018

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
R018 - Resin transfer molding (Vacuum molding)	OAC rule 3745-31-05 (A)(3)	7.3tons OC per year
	OAC rule 3745-21-07 (G)(2)	8 pounds OC per hour and 40 pounds per year
	Subpart WWWW of 40 CFR Part 63	See Part II.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

1. The permittee shall collect the following information for each day.
 - a. The identification of each polyester resin employed.
 - b. The amount of each polyester resin employed, in gallons.
 - c. The weight of each organic material employed, in pounds per gallon.
 - d. The amount of resin which is OC; in percent by weight.

- e. The actual emissions of OC, in pounds per day. This is calculated by multiplying the gallons of resin employed by the lbs resin per gallon material employed times the amount of available OC (percent) times the emission factor. The emission factor (2%) is taken from Table 5-2 from "Baseline Emissions Estimates and Methodologies".
- f. The hours per day the emissions unit was in operation.
- g. The average hourly emission rate. This is calculated by dividing the daily emissions as calculated in III.1.e. by the hours of operation, as documented in III.1.f.
- h. The annual OC emissions. These shall be calculated by summing the daily emissions.

The above information shall be collected each day. The emissions calculations shall be conducted as often as practical, but no later than 10 days following the each of each calendar month. It shall be understood that the facility is responsible for operating in compliance at all times; the facility will accept all liability assumed for non-compliance which was unknown until the calculations were performed. All records listed above shall be retained on site and shall be make available to the Director or any authorized representative of the Director.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the total organic compound emissions exceeded 8 pounds per hour and 40 pounds per day, and the actual organic compound emissions for each such month.
- 2. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c of this permit.
- 3. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year and shall include the actual tons of acetone employed and the allowable tons of acetone (7.3 tons).

V. Testing Requirements

- 1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation
8 pounds OC per hour

Applicable Compliance Method
Compliance shall be determined based upon the record keeping specified in A.III.1.e.
 - b. Emission Limitation

51

Picker

PTI A

Emissions Unit ID: R018

Issued: To be entered upon final issuance

40 pounds OC per day

Applicable Compliance Method

Compliance shall be determined based upon the record keeping specified in A.III.1.g.

c. Emission Limitation

7.3 tons OC per year

Applicable Compliance Method

Compliance shall be determined based upon the record keeping specified in A.III.1.h.

VI. Miscellaneous Requirements

None

Picker

PTI A

Emissions Unit ID: R018

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
R018 - Resin transfer molding (Vacuum molding)	OAC rule 3745-31-05	LIMIT(s)

2. Additional Terms and Conditions

2.a 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