



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 02-22458**

**Fac ID: 0204010112**

**DATE: 7/3/2007**

Iten Industries, Inc., Plant 1  
Greg Finlaw  
P.O. Box 2150  
Ashtabula, OH 44005

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

*Michael W. Ahern*

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

CC: USEPA

NEDO



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**Permit To Install  
Terms and Conditions**

**Issue Date: 7/3/2007  
Effective Date: 7/3/2007**

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**FINAL PERMIT TO INSTALL 02-22458**

Application Number: 02-22458  
Facility ID: 0204010112  
Permit Fee: **\$200**  
Name of Facility: Iten Industries, Inc., Plant 1  
Person to Contact: Greg Finlaw  
Address: P.O. Box 2150  
Ashtabula, OH 44005

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**4001 Benefit Ave.  
Ashtabula, Ohio**

Description of proposed emissions unit(s):  
**Increased production and formulation change for P015 Compression Mold Press.**

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

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Chris Korleski  
Director

## Part I - GENERAL TERMS AND CONDITIONS

### 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

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the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 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

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

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## 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

## 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 its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. 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.

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- 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 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 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.

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**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.

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### **13. Permit-To-Install**

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

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

### **1. Compliance Requirements**

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

### **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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **3. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder.

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The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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#### **4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or 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)**

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

#### **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**

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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 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., postmarked), 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 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>
OC	7.3

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## Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

### MACT SUBPART WWWW REQUIREMENTS

1. The following emissions units are subject to 40 CFR Part 63, Subpart WWWW-- National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production:  
  
P015 - Compression Molding Press C
  2. The permittee is subject to the following requirements specified in 40 CFR Part 63, Subpart A as listed in Table 15 of 40 CFR Part 63, Subpart WWWW:  
  
Parts 63.1 (a)(1)-(4), 63.1(a)(6), 63.1 (a)(10)-(14), 63.1(b)(1), 63.1 (b)(3), 63.1 (c)(1) and (2), 63.1 (c)(5), 63.1 (e), 63.2, 63.3, 63.4, 63.5 (a)(1) and (2), 63.5(b)(1), 63.5(b)(3) and (4), 63.5 (b)(6), 63.5 (d)(1) and (2), 63.5 (d)(4), 63.5 (e)(1) - (5), 63.5 (f)(1) and (2), 63.6 (a)(1) and (2), 63.6 (b)(1)-(5), 63.6 (b)(7), 63.6 (c)(1) and (2), 63.6 (c)(5), 63.6 (e)(1) - (3), 63.6 (f)(2) and (3), 63.6 (g)(1) - (3), 63.6 (i)(1)-(14), 63.6 (i)(16), 63.6 (j), 63.7 (a)(1), 63.7 (a)(3), 63.7 (b)(1) and (2), 63.7 (c), 63.7 (d), 63.7(e), 63.7 (f), 63.7 (g), 63.7 (h), 63.8 (a)(1) and (2), 63.8 (a)(4), 63.8 (b)(1) - (3), 63.8 (c)(1) - (4), 63.8 (c)(6) - (8), 63.8 (d), 63.8 (e)(1) - (4), 63.8 (e)(5)(i), 63.8 (f)(1) - (6), 63.8 (g)(1) - (5), 63.9 (a)(1)-(4), 63.9 (b)(1) and (2), 63.9 (b)(4)(i), 63.9 (b)(4)(v), 63.9 (b)(5), 63.9(c), 63.9 (d), 63.9 (e), 63.9 (g)(1), 63.9 (g)(3), 63.9 (h)(1) - (3), 63.9 (h)(5) and (6), 63.9 (i), 63.9(j), 63.10 (a), 63.10 (b)(1), 63.10 (b)(2)(i) - (xiv), 63.10 (b)(3), 63.10 (c)(1), 63.10 (c)(5) - (8), 63.10 (c)(10) - (15), 63.10 (d)(1) and (2), 63.10 (d)(4) and (5), 63.10 (e)(1) - (3), 63.10 (f), 63.11, 63.12, 63.13, 63.14, and 63.15.
  3. The permittee submitted an Initial Notification on August 8, 2003. If there is a change in any information submitted in the Initial Notification, the permittee must submit the changes in writing to the Administrator within 15 calendar days after the change.
  4. The permittee submitted a revised Notification of Compliance Status on January 25, 2007. If there is a change in any information submitted in the Notification of Compliance Status, the permittee must submit the changes in writing to the Administrator within 15 calendar days after the change.
- B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**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 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 specified in narrative form following the table.

**Operations, Property, and/or Equipment - (P015) - Compression Mold Press A - The requirements of this Permit to Install supercedes the requirements of PTI 02-10406 issued on November 14, 1996 and administratively modified on January 3, 1997.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 8 lbs/hr, 40 lbs/day and 7.3 tons/year.  See section A.I.2.a below.
OAC rule 3745-21-07(G)(2)	The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
40 CFR Part 63, Subpart WWWW	See sections A.II.1 and A.II.2 below.

**2. Additional Terms and Conditions**

- 2.a The OC emissions from the molding operations consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

**II. Operational Restrictions**

1. The permittee shall uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds per one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.

The permittee molds flat composite sheet used in electrical insulation and power distribution applications. Liquid resin paste is stored in covered drums at each compression molding machine and is applied to precut fiberglass just in time for the next cycle. No more than one wet lay-up is produced per press cycle.

Emissions Unit ID: P015

2. The permittee shall keep all containers that store HAP-containing materials closed or covered, except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall conduct daily inspections of this emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standards identified in sections A.II.1 and A.II.2 and shall include the following information:
  - a. whether the emissions unit was in operation;
  - b. whether the permittee uncovered, unwrapped or exposed more than one charge per mold cycle per compression/injection molding machine as specified in section A.II.1;
  - c. whether all containers that store HAP-containing materials were closed or covered, except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety as specified in section A.II.2; and
  - d. information on the duration and cause of each deviation and the corrective action taken.
2. The permittee shall collect and record the following information for each day for this emissions unit:
  - a. the company identification for each resin employed;
  - b. the weight of each resin employed, in pounds;
  - c. the total weight of each resin employed, in pounds;
  - d. the OC content of each resin employed, in percent by weight;
  - e. the total OC emission rate from all resins employed, in pounds per day, calculated as specified in section A.V.1.b;
  - f. the total number of hours the emissions unit was in operation;
  - g. the average, hourly, OC emission rate from all resins employed (calculated by dividing the total, daily OC emissions by the total hours of operation, (e)/(f)), in pounds per hour (same as section A.V.1.a); and



Emissions Unit ID: P015

2. The permittee shall submit a semiannual compliance report. Each semiannual 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.

Each semiannual compliance report shall be postmarked or delivered no later than January 31 and July 31, whichever date is the first date following the end of the semiannual reporting period.

Each semiannual compliance report must contain the following information:

- a. the company name and address;
- b. a 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;
- c. the date of the report and the beginning and ending dates of the reporting period;
- d. if there are no deviations from any work practice standards in 40 CFR Part 63, Subpart WWWW, a statement that there were no deviations from work practice standards during the reporting period; and
- e. for each deviation from the requirements for work practice standards, the compliance report must contain the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

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 40 CFR Part 63, Subpart WWWW in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 of 40 CFR Part 63, Subpart WWWW, along with, or as part of, the semiannual monitoring report required by 40 CFR Part 70.6(a)(3)(iii)(A) or 40 CFR Part 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 40 CFR Part 63, Subpart WWWW, 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.

3. If there is a change in any information submitted in any notification, the change must be submitted in writing to the Administrator within 15 calendar days after the change.

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4. The permittee shall submit annual reports that specify the total OC emission rate 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 allowable emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emissions Limitation:  
  
OC emissions shall not exceed 8 lbs/hr.

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Applicable Compliance Method:

Compliance may be demonstrated by dividing the daily OC emissions, as calculated in section A.V.1.b, by the number of actual hours that the emissions unit was in operation, as recorded in section A.III.2.f.

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.

b. Emission Limitation:

OC emissions shall not exceed 40 lbs/day.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2. Compliance may be determined based upon the following equation:

$E(OC) = \text{the summation of } (Pol) \times (S/100) \times (EF/100) \text{ for each of the mold materials employed.}$

where:

$E(OC)$  = total OC emissions from resins employed, in pounds per day;

$(Pol)$  = the weight of each resin (i) employed, as recorded in section A.III.2.c, in pounds per day;

$(S)$  = the OC content of each resin (i) employed, as recorded in section A.III.2.d, in percent by weight; and

$(EF)$  = the emission factor of 1%. This EF is within the 1-3% range provided in Table 4.12-2 on page 4.12-8 of AP-42 (9/88).

c. Emission Limitation:

OC emissions shall not exceed 7.3 tons/year.

Emissions Unit ID: P015

## Applicable Compliance Method:

Compliance shall be demonstrated based upon the summation of the daily OC emission rates from the resins employed, EOC (lbs/day), as specified in section E.1.b of this permit for the calendar year, and then divided by 2,000 lbs/ton.

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

**VI. Miscellaneous Requirements**

None

Issued: 7/3/2007

**B. State Only 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 specified in narrative form following the table.

**Operations, Property, and/or Equipment - (P015) - Compression Mold Press A - The requirements of this Permit to Install supercedes the requirements of PTI 02-10406 issued on November 14, 1996 and administratively modified on January 3, 1997.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None