State of Ohio Environmental Protection Agency

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

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

Application No: 02-18004

DATE: 7/24/2003

MFG Premier Molding Company
Matthew Narducci
PO Box 675 4401 Benefit Ave
Ashtabula, OH 440050675

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 of 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 **$400** 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.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA NEDO Eastgate Development & Trans Study NY PA

DRAFT PERMIT TO INSTALL 02-18004

Application Number:	02-18004
APS Premise Number:	0204010173
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	MFG Premier Molding Company
Person to Contact:	Matthew Narducci
Address:	PO Box 675 4401 Benefit Ave Ashtabula, OH 440050675

Location of proposed air contaminant source(s) [emissions unit(s)]:
4401 Benefit Ave
Ashtabula, Ohio

Description of proposed emissions unit(s):
2 Compression Molding Presses.

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 Record keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

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 record keeping 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 <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be 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.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. 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

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 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.

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 record keeping 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 record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

8. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) 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., 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

Pollutant	Tons Per Year
OC	11.88

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

On April 21, 2003 U.S. EPA promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, 40 CFR 63 Subpart WWWW. When the NESHAP is promulgated, the facility may be subject as an existing major source with a compliance date as specified in the NESHAP.

1. Within 120 days after promulgation (August 18, 2003) of 40 CFR Part 63 Subpart WWWW, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standards. If the permittee is subject to the final standards, the following information shall also be included in the Initial Notification Report:

a. The name and mailing address of the permittee;

b. The physical location of the source if it is different from the mailing address;

c. Identification of the relevant maximum achievable control technology (MACT) standards and the permittee's compliance date;

d. A brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and

e. A statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.

2. Within 60 days following completion of any required compliance demonstration activity specified in 40 CFR Part 63 Subpart WWWW, the permittee shall submit a notification of compliance status that contains the following information:

a. The methods used to determine compliance;

b. The results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

c. The methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

d. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR Part 63 Subpart WWWW;

e. An analysis demonstrating whether the affected source is a major source or an area source;

f. A description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and

g. A statement of whether or not the permittee has complied with the requirements of 40 CFR Part 63 Subpart WWWW.

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

None

Emissions Unit ID: **P042**

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P042 - 500 Ton compression mold press no. 29 for reinforced plastic composite parts	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.14 lbs/hr, 27.4 lbs/day and 5.0 tons/year. See section A.2.a. The requirements of this rule also include compliance with the requirements of 40 CFR Parts 63.5780 - 63.5935.
	OAC rule 3745-21-07(G)(2)	The emissions limitations specified by this rule are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 63, Subpart WWWW	See section A.2.b. and Part II section A.

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).

2.b The following work practice(s) shall be employed to minimize the generation of styrene emissions: only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press, as required in 40 CFR 63.5805(a) and specified in Table 4 of 40 CFR, Part 63, Subpart WWWW.

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of production material charges associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize styrene emissions are employed. The inspections shall be performed during representative, normal operating conditions.

2. The permittee shall collect and record the following information for each day for this emissions unit:

a. The company identification for each sheet mold compound (SMC) and each wet/preform combination employed;

b. The weight of each sheet mold compound (SMC) and each wet/preform combination employed, in pounds;

c. The weight of all sheet mold compound (SMC) and each wet/preform combination employed, in pounds;

d. The total OC emission rate for all materials employed, in pounds;

e. The actual number of hours the emissions unit was in operation;

f. The average hourly OC emission rate for all materials employed, i.e., (d)/(e), in pounds per hour (average);

g. The date and reason any required inspection was not performed; and

h. The dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.

3. The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each record. Retention of copies of the semi-annual compliance report(s), required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:

a. An identification of each day during which the average hourly OC emissions from the production materials exceeded 1.14 pounds per hour, and the actual average hourly OC

emissions for each such day;

b. An identification of each day during which the OC emissions from the production materials exceeded 27.4 pounds per day, and the actual OC emissions for each such day.

2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which includes a certified statement in the notice of compliance status that only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press.

a. The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date.

b. The initial compliance report must be submitted by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

3. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:

a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirement in section A.I.2.b., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.

b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:

i. Company name and address;

ii. 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;

iii. Date of the report and beginning and ending dates of the reporting period;

iv. The total operating time of this emissions unit; and

v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.

c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).

4. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year, in tons/year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation: 1.14 lbs OC/hr.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.f. If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

b. Emissions Limitation: 27.4 lbs OC/day.

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

E_OC = summation of {(Wi_SMC) + [(Wi_WM_wm/pf) + (Wi_PF_wm/pf)]} x EF.

where:
E_OC = the daily, OC emissions for all materials, in pounds per day.

Wi_SMC = the weight of SMC "i" employed, in pounds per day.

Wi_WM_wm/pf = the weight of wet mix employed in wet mix/preform combination "i", in pounds per day.

Wi_PF_wm/pf = the weight of preform employed in wet mix/preform combination "i", in pounds per day.

EF = emission factor for styrene emissions from the mold press, which is 0.00134 pounds per pound of mold compound materials, as determined from a Society of Plastics Industry report, "Styrene Emissions during the Charging and Molding Cycle."

c. Emissions Limitation: 5.0 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the mold compounds, E_OC, as specified in section E.1.b. of this permit for the calendar year, and shall be divided by 2,000 pounds/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

1. PTI 02-16595 was issued on September 9, 2002 for emissions unit P041, a 1500 ton compression mold press, company identification number 29, for reinforced plastic composite parts. P041 has been placed on temporary shutdown status for an indefinite period. If operations at P041 resume the permittee shall make a written request to change the company identification number within PTI 02-16595 and similarly for the Title V Operating Permit to one other than "number 29".

Emissions Unit ID: **P042**

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P042 - Compression mold press no. 29 for reinforced plastic composite parts		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

1. Modeling the federally regulated pollutants, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

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 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P043 - 1000 Ton compression mold press no. 30 for reinforced plastic composite parts	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.57 lbs/hr, 37.7 lbs/day and 6.88 tons/year. See section A.2.a. The requirements of this rule also include compliance with the requirements of the daily limit in OAC rule 3745-21-07(G)(2) and the requirements of 40 CFR Parts 63.5780 - 63.5935.
	OAC rule 3745-21-07(G)(2)	The hourly emissions limitations specified by this rule are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 63, Subpart WWWW	See section A.2.b. and Part II section A.

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).

2.b The following work practice(s) shall be employed to minimize the generation of styrene emissions: only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press, as required in 40 CFR 63.5805(a) and specified in Table 4 of 40 CFR, Part 63, Subpart WWWW.

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of production material charges associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize styrene emissions are employed. The inspections shall be performed during representative, normal operating conditions.

2. The permittee shall collect and record the following information for each day for this emissions unit:

a. The company identification for each sheet mold compound (SMC) and each wet/preform combination employed;

b. The weight of each sheet mold compound (SMC) and each wet/preform combination employed, in pounds;

c. The weight of all sheet mold compound (SMC) and each wet/preform combination employed, in pounds;

d. The total OC emission rate for all materials employed, in pounds;

e. The actual number of hours the emissions unit was in operation;

f. The average hourly OC emission rate for all materials employed, i.e., (d)/(e), in pounds per hour (average);

g. The date and reason any required inspection was not performed; and

h. The dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.

3. The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each record. Retention of copies of the semi-annual compliance report(s) , required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following

information:

a. An identification of each day during which the average hourly OC emissions from the production materials exceeded 1.57 pounds per hour, and the actual average hourly OC emissions for each such day;

b. An identification of each day during which the OC emissions from the production materials exceeded 37.7 pounds per day, and the actual OC emissions for each such day.

2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which includes a certified statement in the notice of compliance status that only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press.

a. The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date.

b. The initial compliance report must be submitted by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

3. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:

a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirement in section A.I.2.b., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.

b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:

i. Company name and address;

ii. 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;

iii. Date of the report and beginning and ending dates of the reporting period;

iv. The total operating time of this emissions unit; and

v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.

c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).

4. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year, in tons/year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation: 1.57 lbs OC/hr.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.f. If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

b. Emissions Limitation: 37.7 lbs OC/day.

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

E_OC = summation of {(Wi_SMC) + [(Wi_WM_wm/pf) + (Wi_PF_wm/pf)]} x EF.

where:
E_OC = the daily, OC emissions for all materials, in pounds per day.

Wi_SMC = the weight of SMC "i" employed, in pounds per day.

Wi_WM_wm/pf = the weight of wet mix employed in wet mix/preform combination "i", in pounds per day.

Wi_PF_wm/pf = the weight of preform employed in wet mix/preform combination "i", in pounds per day.

EF = emission factor for styrene emissions from the mold press, which is 0.00134 pounds per pound of mold compound materials, as determined from a Society of Plastics Industry report, "Styrene Emissions during the Charging and Molding Cycle."

c. Emissions Limitation: 6.88 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the mold compounds, E_OC, as specified in section E.1.b. of this permit for the calendar year, and shall be divided by 2,000 pounds/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

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P043 - Compression mold press no. 30 for reinforced plastic composite parts		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

1. Modeling the federally regulated pollutants, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Emissions Unit ID: **P043**

NEW SOURCE REVIEW FORM B

PTI Number: 02-18004 Facility ID: 0204010173

FACILITY NAME MFG Premier Molding Company

FACILITY DESCRIPTION Reinforced Composite Plastics Production CITY/TWP Ashtabula

SIC CODE 3089 SCC CODE 3-08-007-99 EMISSIONS UNIT ID P042

EMISSIONS UNIT DESCRIPTION Compression mold press no. 29 for reinforced plastic composite parts

DATE INSTALLEDUpon permit issuance

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment				
PM_{10}	Unclassified				
Sulfur Dioxide	Attainment				
Organic Compounds	Attainment	0.54 lb/hr 10.86 lbs/day	1.36	1.14 lbs/hr 27.4 lbs/day	5.0
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead	Attainment				
Air Toxics: styrene	Unclassified	0.54 lb/hr 10.86 lbs/day	1.36	1.14 lbs/hr 27.4 lbs/day	5.0

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? yes, MACT Subpart WWWW PSD? no OFFSET POLICY? no

no

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination 1.14 lbs/hr, 27.4 lbs/day & 5.0 tons/year of OC emissions, based on max. mtls. usage x 0.00134 lb OC/lb mtls x 1.4 factor for conservative eng. estimate. BAT is work practice requirement to allow only one charge of molding compound to be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press per 40 CFR Parts 63.5780 - 63.5935, MACT for Reinforced Plastic Composites Production.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No, P042 is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $ NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: NA.

NEW SOURCE REVIEW FORM B

PTI Number: 02-18004 Facility ID: 0204010173

FACILITY NAME MFG Premier Molding Company

FACILITY DESCRIPTION Reinforced Composite Plastics Production CITY/TWP Ashtabula

Emissions Unit ID: **P043**

SIC CODE 3089 SCC CODE 3-08-007-99 EMISSIONS UNIT ID P043

EMISSIONS UNIT DESCRIPTION Compression mold press no. 30 for reinforced plastic composite parts

DATE INSTALLEDupon permit issuance

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment				
PM_{10}	Unclassified				
Sulfur Dioxide	Attainment				
Organic Compounds	Attainment	0.84 lb/hr 20.26 lbs/day	2.78	1.57 lbs/hr 40 lbs/day	7.3
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead	Attainment				
Air Toxics: styrene	Unclassified	0.84 lb/hr 20.26 lbs/day	2.78	1.57 lbs/hr 40 lbs/day	7.3

APPLICABLE FEDERAL RULES:

NSPS? no. NESHAP? yes, MACT Subpart WWWW. PSD? no. OFFSET POLICY? no.

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination 1.57 lbs OC/hr based on max. mtls. usage x 0.00134 lb OC/lb mtls x 1.4 factor for conservative eng. estimate. 40 lbsOC/day per OAC rule 3745-21-07(G)(2). 7.3 TPY OC is daily limit x 365 days/yr x ton/2000lbs. BAT is work practice requirement to allow only one charge of molding compound to be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press per 40 CFR Parts 63.5780 - 63.5935, MACT for Reinforced Plastic Composites Production.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No, P043 is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $ NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaiminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: NA.