



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

RE: **DRAFT PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL
ASHTABULA COUNTY
Application No: 02-11131

DATE: 7/27/2004

MFG Premier Molding Company
Matthew Narducci
PO Box 1000 4401 Benefit Ave
Ashtabula, OH 44003

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification 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 modification a fee of **\$ 750** 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, Supervisor
Field Operations and Permit 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 02-11131 FOR AN AIR CONTAMINANT SOURCE FOR
MFG PREMIER MOLDING COMPANY**

On 7/27/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **MFG Premier Molding Company**, located at **4401 Benefit Ave, Ashtabula, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-11131:

Administrative Modification to PTI 02-11131, issued on 9/21/2000, to modify certain conditions due to an ERAC appeal.

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 MODIFICATION OF PERMIT TO INSTALL 02-11131

Application Number: **02-11131**
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 1000 4401 Benefit Ave
Ashtabula, OH 44003**

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

Description of modification:
Administrative Modification to PTI 02-11131, issued on 9/21/2000, to modify certain conditions due to an ERAC appeal.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

MFG Premier Molding Company

Facility ID: **0204010173**

PTI Application: 02-11131

Modification Issued: To be entered upon final issuance

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION

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).

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.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for **MFG Premier Molding Company** located in **ASHTABULA** County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number

P001

P007

P008

P009

P010

P008
Cont'd

P009
Cont'd

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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		Source Identification <u>Description</u>	48" Preform/Oven Number 3	
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P011	P012 Cont'd	48" Preform/Oven Number 1		
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P012			80" Preform/Oven	
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			48" Preform/Oven Number 4	
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	PTI 02-11131, issued on 11/5/97 and modified on 9/21/00.	Wet Resin Mixer Number 3 - second administrative modification of PTI 02-11131, issued on 11/5/97 and modified on 9/21/00.		

Wet Resin Mixer Number 2 - second administrative modification of PTI 02-11131, issued on 11/5/97 and modified on 9/21/00.

Wet Resin Mixer Number 1 - Second administrative modification of

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	<p style="text-align: center;"><u>BAT Determination</u></p>	<p>Use of non-photochemically reactive binder solution. Use of natural gas as the fuel.</p>	<p>Use of non-photochemically reactive binder solution. Use of natural gas as the fuel.</p>	<p>reactive binder solution. Use of natural gas as the fuel.</p>
				<p>Use of a dust control device.</p>
			<p>Use of non-photochemically</p>	

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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Use of a dust control device.

Use of a dust control device.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
			3745-17-07(A) 3745-17-11 3745-21-07(G)(1) 3745-21-08 3745-23-06	
	Applicable Federal & <u>OAC Rules</u>	3745-31-05 3745-17-07(A) 3745-17-11 3745-21-07(G)(1)		
	3745-31-05	3745-21-08		
	3745-17-07(A)	3745-23-06		
	3745-17-11			
	3745-21-07(G)(1)			
	3745-21-08			
	3745-23-06			
				3745-31-05 3745-17-11 3745-21-07 (G)(2) 40 CFR 63, Subpart WWWW
			3745-31-05 3745-17-07(A) 3745-17-11 3745-21-07(G)(1) 3745-21-08 3745-23-06	
		3745-31-05		

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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3745-31-05
3745-17-11
3745-21-07 (G)(2)
40 CFR 63,
Subpart WWWW

3745-31-
05
3745-17-
11
3745-21-
07
(G)(2)
40 CFR
63,
Subpart
WWW
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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
<p>Permit Allowable Mass Emissions and/or Control/Usage Requirements</p>	<p>Visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 6-minute average, except as specified by rule. 0.629 lb/hr of PM emissions from the spray-up operation. 2.84 TPY of total PM emissions from spray-up and fuel combustion. 6.9 pounds/day OC from binder usage at sprayup; 3 pounds/ hour and 15 pounds/ day OC from binder usage at the oven; and 4.09 TPY from all operations of OC emissions. 0.09 lb/hr and 0.39</p>	<p>TPY of CO emissions from fuel combustion at the oven. 0.10 lb/hr and 0.44 TPY of NO_x emissions from fuel combustion at the oven.</p> <p>Visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 6-minute average, except as specified by rule. 0.629 lb/hr of PM emissions from the spray-up operation. 2.84 TPY of total PM emissions from spray-up and fuel combustion. 6.9 pounds/day OC from binder usage at sprayup; 3 pounds/ hour and 15 pounds/ day OC from binder usage at the oven; and 4.09 TPY from all operations of OC emissions. 0.09 lb/hr and 0.39 TPY of CO emissions from fuel combustion at the oven. 0.10 lb/hr and 0.44 TPY of NO_x emissions from fuel combustion at the oven.</p> <p>Visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 6-minute average, except as specified</p>	<p>by rule. 0.629 lb/hr of PM emissions from the spray-up operation. 2.84 TPY of total PM emissions from spray-up and fuel combustion. 6.9 pounds/day OC from binder usage at sprayup; 3 pounds/ hour and 15 pounds/ day OC from binder usage at the oven; and 4.09 TPY from all operations of OC emissions. 0.09 lb/hr and 0.39 TPY of CO emissions from fuel combustion at the oven. 0.10 lb/hr and 0.44 TPY of NO_x emissions from fuel combustion at the oven.</p> <p>Visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 6-minute average, except as specified by rule. 1.83 lbs/hr of PM emissions from the spray-up operation.</p>	<p>8.36 TPY of total PM emissions from spray-up and fuel combustion. 6.9 pounds/day OC from binder usage at sprayup; 3 pounds/ hour and 15 pounds/day OC from binder usage at the oven; and 4.18 TPY from all operations of OC emissions. 0.39 lb/hr and 1.71 TPY of CO emissions from fuel combustion at the oven. 0.39 lb/hr and 1.71 TPY of NO_x emissions from fuel combustion at the oven.</p> <p>1.05 pounds/hour and 4.60 TPY of PM emissions. 8 pounds/ hour, 40 pounds/day and 7.3 TPY of OC emissions. This emissions unit shall demonstrate compliance with all applicable requirements contained in the final Maximum Achievable Control Technology</p>

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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
<p>(MACT) standard found in 40 CFR 62, Subpart WWW for Reinforced Plastic Composites Production by April 21, 2006. 1.05 pounds/hour and 4.60 TPY of PM emissions. 8 pounds/hour, 40 pounds/day and 7.3 TPY of OC emissions. This emission unit shall</p>	<p>demonstrate compliance with all applicable requirements contained in the final Maximum Achievable Control Technology (MACT) standards found in 40 CFR 62, Subpart WWW for Reinforced Plastic Composites Production by April 21, 2006. 1.05 pounds/hour and 4.60 TPY of PM emissions. 8 pounds/hour, 40 pounds/day and 7.3 TPY of OC emissions. This emissions unit shall demonstrate compliance with all applicable requirements contained in the final Maximum Achievable Control Technology</p>	<p>(MACT) standards found in 40 CFR 62, Subpart WWW for Reinforced Plastic Composites Production by April 21, 2006.</p>		

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**SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
PM	30.68
OC	49.39
CO	1.55
NO _x	4.36

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to OEPA Northwest District Office - DAPC, 2110 East Aurora Road, Twinsburg, Ohio 44087.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

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MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the OEPA Northwest District Office - DAPC, 2110 East Aurora Road, Twinsburg, Ohio 44087.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. INTRODUCTION

The company manufactures fiber glass reinforced plastic parts. This permit is for four preform/ovens (P001, P007, P008 and P009) and three mixers for wet resin mix (P010, P011 and P012).

B. EMISSION LIMITATIONS

1. The emissions from each of emissions units P001, P007, and P008 shall not exceed the following limits:
 - a. 6.9 pounds/day of organic compound (OC) emissions from binder usage at the sprayup operation;
 - b. 3 pounds/hour and 15 pounds/day of OC emissions from binder usage at the oven operation;
 - c. 4.09 TPY of OC emissions from all operations, including emissions from combustion of fuel;
 - d. 0.629 lb/hr of PM emissions from the sprayup operation. 2.84 TPY of total PM emissions from sprayup and fuel combustion.
 - e. 0.10 pound/hour and 0.44 TPY of nitrogen oxide compounds (NO_x) emissions; and,

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- f. 0.09 pound/hour and 0.39 TPY of carbon monoxide (CO) emissions.
2. The emissions from emissions unit P009 shall not exceed the following limits:
 - a. 6.9 pounds/day of OC emissions from binder usage at the sprayup operation;
 - b. 3 pounds/hour and 15 pounds/day of OC emissions from binder usage at the oven operation;
 - c. 4.18 TPY of OC emissions from all operations, including emissions from combustion of fuel;
 - d. 1.83 pounds/hour of PM emissions from the sprayup operation. 8.36 TPY of total PM emissions from sprayup and fuel combustion.
 - e. 0.39 pound/hour and 1.71 TPY of NO_x emissions; and,
 - f. 0.39 pound/hour and 1.71 TPY of carbon monoxide (CO) emissions.
3. The emissions from each of emissions units P010, P011 and P012 shall not exceed the following limits:
 - a. 1.05 pounds/hour and 4.60 TPY of PM emissions; and,
 - b. 8 pounds/hour, 40 pounds/day and 7.3 TPY of OC emissions.

C. OPERATIONAL RESTRICTIONS

1. Only non-photochemically reactive materials shall be employed at the preform/ovens (P001, P007, P008 and P009).
2. Natural gas shall be employed as the fuel in a burner with a rated capacity of no more than 1 MMBTU/hour at each of the 48" preform/ovens (P001, P007, and P008).
3. Natural gas shall be employed as the fuel in a burner with a rated capacity of no more than 4 MMBTU/hour at the 80" preform/oven (P009).
4. The settling chamber installed on the wet resin mixers (P010, P011 and P012) for the control of particulate matter shall be operated and maintained in accordance with the manufacturer's

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specifications, instructions and operating manual(s).

5. The wet resin mixers (P010, P011, and P012) shall demonstrate compliance with all applicable operational restrictions contained in the final Maximum Achievable Control Technology (MACT) standards found in 40 CFR 63, Subpart WWW for Reinforced Plastic Composites Production by April 21, 2006.

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D. MONITORING AND/OR RECORDKEEPING REQUIREMENTS

1. The permittee shall collect and record the following information for each day for each of the preform/ovens (P001, P007, P008 and P009):
 - a. the company identification for each binder solution employed;
 - b. the number of pounds of each binder solution employed;
 - c. the organic compound content of each binder solution, in percent by weight;
 - d. the total available (prior to applying the sprayup/oven "split") daily organic compound emission rate for all binder solutions, in pounds per day;
 - e. the total number of hours the emissions unit was in operation;
 - f. the total organic compound emission rate for all binder solutions at the sprayup operation (after applying the sprayup/oven "split"), in pounds per day;
 - g. the total organic compound emission rate for all binder solutions at the oven operation (after applying the sprayup/oven "split"), in pounds per day; and,
 - h. the average hourly organic compound emission rate for all binder solutions at the oven operations, i.e., (g)/(e), in pounds per hour (average).

2. The permittee shall collect and record the following information for each day for the each of the wet resin mixers (P010, P011 and P012):
 - a. the company identification for each mix manufactured;
 - b. the number of pounds of each mix manufactured;
 - c. the solids content of each mix, in percent by weight;
 - d. the organic compound content of each mix, in percent by weight;
 - e. the total number of hours the emissions unit was in operation;
 - f. the total organic compound emission rate from all mixes, in pounds per day;

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- g. the average hourly organic compound emission rate, i.e., (f)/(e), in pounds per hour (average); and,
 - h. the average hourly PM emission rate, in pounds per hour (average).
3. The wet resin mixers (P010, P011, and P012) shall demonstrate compliance with all applicable monitoring and record keeping requirements contained in the final Maximum Achievable Control Technology (MACT) standards found in 40 CFR 63, Subpart WWWW for Reinforced Plastic Composites Production by April 21, 2006.
 4. The Air Toxic Policy Clarifying Language term and conditions as specified below in sections D.5 to D.7 shall become inapplicable upon the permittee certifying compliance with final National Emission Standard for Hazardous Air Pollutants (NESHAP) for reinforced plastic Composites Production, 40 CFR 63, Subpart WWWW.
 5. Air Toxic Policy Clarifying Language

The permit to install for the wet resin mixers (P010, P011, and P012) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved 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 for the "worst case" pollutant(s):

Pollutant: Styrene

TLV ($\mu\text{g}/\text{m}^3$): 213,000

Maximum Hourly Emission Rate (lbs/hr): 8.0 from each mixer (24 lbs/hr total)

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 2,460 (total impact)

MAGLC ($\mu\text{g}/\text{m}^3$): 5,071

6. 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 still 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

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applying the "Air Toxic Policy" include the following:

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

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.

E. REPORTING REQUIREMENTS

1. The permittee shall submit deviation (excursion) reports to the Ohio EPA Northeast District Office which identify all exceedances. The reports shall include the following information:
 - a. statement(s) noting the allowable limit(s) as specified in term B;
 - b. an identification of each day during which the total organic compound emissions from the sprayup operation at any of the preform/ovens (P001, P007, P008 or P009) exceeded 6.9 pounds per day, and the actual organic compound emissions from the sprayup operation for

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each such day;

- c. an identification of each day during which the total organic compound emissions from the oven operation at any of the preform/ovens (P001, P007, P008 or P009) exceeded 15 pounds per day, and the actual organic compound emissions from the sprayup operation for each such day;

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- d. an identification of each day during which the average hourly organic compound emission rate from the oven operation at any of the preform/ovens (P001, P007, P008 or P009) exceeded 3 pounds per hour, and the actual average hourly organic compound emission rate from the oven for each such day;
- e. an identification of each day during which the total organic compound emissions at any of the wet resin mixers (P010, P011 or P012) exceeded 40 pounds per day, and the actual organic compound emissions for each such day;
- f. an identification of each day during which the average hourly organic compound emission rate at any of the wet resin mixers (P010, P011 or P012) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day;
- g. an identification of each day during which the average hourly PM emission rate at any of the wet resin mixers (P010, P011 or P012) exceeded 1.05 pounds per hour, and the actual average hourly organic compound emission rate for each such day; and,
- h. a description of any corrective actions taken to address any exceedance of any emission limitation.

The excursion 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. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC Rule 3745-15-06.)

2. The permittee shall submit annual reports to the Ohio EPA Northeast District Office which include the following information:
 - a. the total organic compound and PM emissions from each emissions unit for the previous calendar year in tons per year.

These reports shall be submitted by April 15 of each year.

3. The wet resin mixers (P010, P011, and P012) shall demonstrate compliance with all applicable reporting requirements contained in the final Maximum Achievable Control Technology (MACT) standards found in 40 CFR 63, Subpart WWWW for Reinforced Plastic Composites Production by April 21, 2006.

F. TESTING REQUIREMENTS

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1. For purposes of calculating the organic compound emission rates for the oven operation at the preform/ovens (P001, P007, P008 and P009) and each associated sprayup operation, the permittee shall utilize a value of 32 percent as the maximum percentage of the organic compounds employed in the sprayup operation that are emitted uncontrolled from the sprayup operation. The remaining 68 percent of the organic compounds employed in the sprayup operation shall be considered to be the uncontrolled emissions for the oven operation. This split of organic compound emissions between the oven operation and the associated sprayup operation is based upon in-house testing, conducted on October 18, 1994, on a similar emissions unit, (P027) 128" Preform/Oven at Plant 2 (0204010230).
2. To calculate organic compound emissions from sprayup and oven operations at the preform/ovens (P001, P007, P008 and P009) for purposes of determining compliance with the applicable emission limitations of this permit, the permittee shall employ the following:

- a. determination of total, available, daily organic compound content for all binder solutions:

$$\sum \text{AOE} = \sum (\text{Wi} \times \text{OCi})$$

$\sum \text{AOE}$ = the total, available, daily organic compound content for all binder solutions, in pounds.

Wi = the weight of binder solution "a" employed, in pounds per day.

OCi = the volatile organic compound content of binder solution "a", in percent by weight.

- b. to calculate emissions from sprayup or oven operations for purposes of determining compliance with the daily organic compound emission limitations of this permit, the permittee shall employ the following:

$$\text{E} = \sum \text{AOE} \times \text{SR}$$

E = total, daily, organic compound emissions, in pounds per day.

SR = split ratio. 0.32 for sprayup operations and 0.68 for oven operations.

3. To calculate organic compound emissions from the wet resin mixers (P010, P011 and P012) for purposes of determining compliance with the applicable emission limitations of this permit, the permittee shall employ the following:

- a. determination of total, available, daily organic compound content for all mixes:

$$\sum \text{AOE} = \sum (\text{Wi} \times \text{OCi})$$

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$\sum AOE$ = the total, available, daily volatile organic compound emissions for all mixes, in pounds.

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

OC_i = the volatile organic compound content of mix "a", in percent by weight.

- b. to calculate emissions from mix operations for purposes of determining compliance with the daily organic compound emission limitations of this permit, the permittee shall employ the following:

E = $\sum AOE \times EF$

E = total, daily, organic compound emissions, in pounds per day.

EF = the emission factor for organic compound emissions, which is 0.01 pound per pound of available organic compound emissions, as noted in section 5.10 of AP-42.

4. To calculate PM emissions from the wet resin mixers (P010, P011 and P012) for purposes of determining compliance with the applicable emission limitations of this permit, the permittee shall employ the following:

- a. determination of total, available, daily PM content for all mixes:

$\sum ASE$ = $\sum (W_i \times SC_i)$

$\sum ASE$ = the total, available, daily PM content for all mixes, in pounds per day.

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

SC_i = the dry solids content of mix "a", in percent by weight.

- b. to calculate emissions from mix operations for purposes of determining compliance with the hourly, PM emission limitations of this permit, the permittee shall employ the following:

E = $\{ \sum ASE \times EF \times (1 - CE) \} / HR$

E = total, average, hourly, PM emissions, in pounds per hour.

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EF = the emission factor for PM emissions, which is 0.01 pound per pound of available PM emissions, as noted in section 5.10 of AP-42.

CE = control efficiency of PM control device.

HR = the total number of hours the emissions unit was in operation.

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

G. MISCELLANEOUS REQUIREMENTS

None.