



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: **FINAL PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL
ASHTABULA COUNTY
Application No: 02-12057

DATE: 10/19/2004

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

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. 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, Ohio 43215

Sincerely,

A handwritten signature in cursive script that reads "Michael W. Ahern".

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

CC: USEPA

NEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 10/19/2004
Effective Date: 10/19/2004**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 02-12057

Application Number: **02-12057**
APS Premise Number: **0204010173**
Permit Fee: **\$750**
Name of Facility: **MFG Premier Molding Company Narducci**
Person to Contact: **Matthew**
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 02-2057, issued on 5/28/98 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: 02-12057

Modification Issued: 10/19/2004

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 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.

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.

MFG Premier Molding Company
PTI Application: 02-12057
Modification Issued: 10/19/2004

Facility ID: **0204010173**

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.

SOURCE OPERATION AND OPERATING PERMIT REQUIREMENTS 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.

MFG Premier Molding Company
PTI Application: 02-12057
Modification Issued: 10/19/2004

Facility ID: **0204010173**



MFG Premier Molding Company
PTI Application: 02-12057
Modification Issued: 10/19/2004

Facility ID: **0204010173**

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

The air contaminant emission units listed below comprise the Permit to Install for **Molded Fiber Glass Co. - Plant 1** located in Ashtabula County. The emission units 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 Emissions Unit No.	Emissions Unit Identification Description	BAT Determina- tion	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P014	Compression Mold Press No. 16 for fiberglass reinforced plastic parts - administrative modification of PTI 02-12057, issued on 5/28/98.	Same as permit allowable emissions	3745-21-07(G)(2) 3745-31-05(A)(3) 40 CFR63, Subpart WWWW	* 8 lbs/hr, 40 lbs/day and 7.3 TPY of OC emissions. **
P015	Compression Mold Press No. 19 for fiberglass reinforced plastic parts-administrat ive modification of PTI 02-12057, issued on 5/28/98.	Same as permit allowable emissions	3745-21-07(G)(2) 3745-31-05(A)(3) 40 CFR63, Subpart WWWW	* 8 lbs/hr, 40 lbs/day and 7.3 TPY of OC emissions. **

MFG Premier Molding Company
PTI Application: 02-12057
Modification Issued: 10/19/2004

Facility ID: **0204010173**

P016	Compression Mold Press No. 22 for fiberglass reinforced plastic parts-administrative modification of PTI 02-12057, issued on 5/28/98.	Same as permit allowable emissions	3745-21-07(G)(2) 3745-31-05(A)(3) 40 CFR63, Subpart WWWW	* 8 lbs/hr, 40 lbs/day and 7.3 TPY of OC emissions. **
P017	Compression Mold Press No. 25 for fiberglass reinforced plastic parts-administrative modification of PTI 02-12057, issued on 5/28/98.	Same as permit allowable emissions.	3745-21-07(G)(2) 3745-31-05(A)(3) 40 CFR63, Subpart WWWW	* 8 lbs/hr, 40 lbs/day and 7.3 TPY of OC emissions. **
P018	Compression Mold Press No. 26 for fiberglass reinforced plastic parts-administrative modification of PTI 02-12057, issued on 5/28/98.	Same as permit allowable emissions.	3745-21-07(G)(2) 3745-31-05(A)(3) 40 CFR63, Subpart WWWW	* 8 lbs/hr, 40 lbs/day and 7.3 TPY of OC emissions. **

MFG Premier Molding Company
PTI Application: 02-12057
Modification Issued: 10/19/2004

Facility ID: **0204010173**

P019	Compression Mold Press No. 27 for fiberglass reinforced plastic parts-administrative modification of PTI 02-12057, issued on 5/28/98.	Same as permit allowable emissions.	3745-21-07(G)(2) 3745-31-05(A)(3) 40 CFR63, Subpart WWWW	* 8 lbs/hr, 40 lbs/day and 7.3 TPY of OC emissions. **
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* The emissions limit based on this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).

** This source shall demonstrate compliance with all applicable requirements contained in the final Maximum Achievable Control Technology (MACT) standards found in 40 CFR 62, Subpart WWWW for Reinforced Plastic Composites Production by April 21, 2006.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	43.8

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Introduction:

The facility makes fiberglass reinforced plastic (FRP) parts. The application is for 5 mold presses installed between 1987 and 1994 (P014 - P018) and , P019 was installed on October 1, 1998 . The OC/VOC emissions from all operations consist of styrene only.

B. Operational Restrictions:

1. The mold presses (P014 through P019) shall demonstrate compliance with all applicable operational restrictions 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.

C. Monitoring and/or Record Keeping Requirements

MFG Premier Molding Company
PTI Application: 02-12057
Modification Issued: 10/19/2004

Facility ID: **0204010173**

1. The permittee shall collect and record the following information for each day for the each of the mold presses (P014-P019):
 - a. The company identification for each mold compound employed;
 - b. The number of pounds of each mold compound employed;
 - c. The total number of hours each emissions unit was in operation;
 - d. The total organic compound emission rate for all mold compounds employed, in pounds per day; and
 - e. The average hourly organic compound emission rate, i.e., (d)/(c), in pounds per hour (average).
2. The mold presses (P014 through P019) 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.
3. The Air Toxic Policy Clarifying Language term and conditions as specified below in sections C.4 to C.6 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.
4. Air Toxic Policy Clarifying Language

The permit-to-install for the mold presses (P014 through P019) 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):

Emissions Unit: P014
Pollutant: Styrene

MFG Premier Molding Company
PTI Application: 02-12057
Modification Issued: 10/19/2004

Facility ID: **0204010173**

Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$): 213,000
Maximum Hourly Emission Rate (pounds/hr): 8.0
Predicted 1 Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 343.1
Maximum Acceptable Ground Level Concentration (MAGLC) ($\mu\text{g}/\text{m}^3$): 5,071

Emissions Unit: P015
Pollutant: Styrene

Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$): 213,000
Maximum Hourly Emission Rate (pounds/hr): 8.0
Predicted 1 Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 343.1
Maximum Acceptable Ground Level Concentration (MAGLC) ($\mu\text{g}/\text{m}^3$): 5,071

Emissions Unit: P016
Pollutant: Styrene

Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$): 213,000
Maximum Hourly Emission Rate (pounds/hr): 8.0
Predicted 1 Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 343.1
Maximum Acceptable Ground Level Concentration (MAGLC) ($\mu\text{g}/\text{m}^3$): 5,071

Emissions Unit: P017
Pollutant: Styrene

Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$): 213,000
Maximum Hourly Emission Rate (pounds/hr): 8.0
Predicted 1 Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 343.1
Maximum Acceptable Ground Level Concentration (MAGLC) ($\mu\text{g}/\text{m}^3$): 5,071

Emissions Unit: P018
Pollutant: Styrene

Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$): 213,000
Maximum Hourly Emission Rate (pounds/hr): 8.0
Predicted 1 Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 343.1
Maximum Acceptable Ground Level Concentration (MAGLC) ($\mu\text{g}/\text{m}^3$): 5,071

Emissions Unit: P019
Pollutant: Styrene

Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$): 213,000
Maximum Hourly Emission Rate (pounds/hr): 8.0
Predicted 1 Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 343.1
Maximum Acceptable Ground Level Concentration (MAGLC) ($\mu\text{g}/\text{m}^3$): 5,071

5. 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

MFG Premier Molding Company
PTI Application: 02-12057
Modification Issued: 10/19/2004

Facility ID: **0204010173**

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 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.).
6. 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(AAA)(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 (AAA)(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.

D. 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:

statement(s) noting the allowable emissions limit(s) for organic compounds, in pounds per hour and pounds per day, as specified in the Air Emission Summary for each emissions unit; an identification of each day during which the average hourly organic compound emission rate exceeded 8 pounds per hour, and the actual average hourly emission rate, in pounds per hour, for each such day from any of the following emissions unit(s): P014-P019; an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual emission rate in pounds per day for each such day from any of the following emissions unit(s): P014-P019; and 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 an annual report to the Ohio EPA Northeast District Office which includes the following information: the OC emissions for the previous calendar year from each emissions units P014-P019.

This report shall be submitted by April 15 of each year.
3. The mold presses (P014 through P019) 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.

E. Testing Requirements:

1. Compliance with the emissions limitation(s) in Air Emission Summary of this permit shall be determined in accordance with the following method(s):

Emission Limitation: 8 lbs OC/hr

Applicable Compliance Method: To calculate organic compound emissions from each of the mold presses (P014-P019) compliance shall be determined based upon the record keeping specified in C.1. e. of this permit.

Emission Limitation: 40 lbs OC/day

Applicable Compliance Method(s): To calculate organic compound emissions from each of the mold presses (P014-P019) for purposes of determining compliance with the applicable emission limitations of this permit, the permittee shall employ the following:

MFG Premier Molding Company
PTI Application: 02-12057
Modification Issued: 10/19/2004

Facility ID: **0204010173**

- i. Determination of total, daily organic compound emissions for all mold compounds:

$$E(\text{lbs/day}) = \Sigma(W_i \times EF)$$

$E(\text{lbs/day})$ = total, daily, organic compound emissions, in pounds per day.

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

$EF(\text{mold press})$ = the organic compound emission factor, which is 0.00134 pound per pound of mold compound, as determined from test data from the Society of Plastics Industry.

Emission Limitation: 7.3 TPY OC

Applicable Compliance Method(s): To calculate organic compound emissions from each of the mold presses (P014-P019) compliance shall be based on the record keeping specified in Term C.1. d. of this permit and shall be the sum of the daily OC emission rates for the calendar year.

2. Any determination of styrene content or other 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).

F. Miscellaneous Requirements:

None.