State of Ohio Environmental Protection Agency

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

Street Address: 122 S. Front Street
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address: Lazarus Gov. Center P.O. Box 1049

Application No: 02-20275
Fac ID: 0204010173
DATE: 5/17/2005

MFG Premier Molding Company
Brian Lehtonen
PO Box 1000 4401 Benefit Ave
Ashtabula, OH 44003

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action 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,

Michael W. Ahern

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

cc: **USEPA** **NEDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install		**Issue Date:**	**5/17/2005**
Terms and Conditions		**Effective Date:**	**5/17/2005**

FINAL PERMIT TO INSTALL 02-20275

Application Number:	02-20275
Facility ID:	0204010173
Permit Fee:	**$500**
Name of Facility:	MFG Premier Molding Company
Person to Contact:	Brian Lehtonen
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 proposed emissions unit(s):
Compression mold press no. 23 for reinforced composite plastic parts.

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

Joseph P. Koncelik

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

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

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

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

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

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <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 recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.
Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

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 recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete

within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

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

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

6. Public Disclosure

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

7. Applicability

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

8. Construction Compliance Certification

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

9. Additional Reporting Requirements When There Are No Deviations of Federally 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	7.2

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

1. 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. The facility (source) may be subject as an existing major source with a compliance date of April 21, 2006 as specified in the NESHAP.

2. Initial Notification Report - The permittee of an affected source (facility) that has an initial startup before the effective date of a relevant standard under 40 CFR Part 63 shall notify the Director in writing that the source is subject to the relevant standard. The Initial Notification Report, which shall be submitted no later than 120 calendar days after the effective date of the relevant standard on August 19, 2006 (or within 120 calendar days after the source becomes subject to the relevant standard), shall provide the following information:

a. The name and address of the owner or operator;

b. The address (i.e., physical location) of the affected source;

c. An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date;

d. A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and

e. A statement of whether the affected source is a major source or an area source.

3. Semi-Annual Compliance Report Requirements

a. Reporting Period and Deadline for Initial Compliance Report - The initial compliance report must cover the period beginning on the compliance date that is specified for your affected source in 40 CFR 63.5800 (April 26, 2006) and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your affected source in 40 CFR 63.5800 (April 26, 2006) . The initial compliance report must be postmarked or delivered to the Ohio EPA Northeast District Office no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for your affected source in 40 CFR 63.5800 (April 26, 2006).

b. Reporting Period and Deadline for Subsequent Compliance Report(s) - Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. Each subsequent compliance report must be postmarked or delivered to the Ohio EPA Northeast District Office no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

c. Semi-Annual Compliance Report Content - The compliance report must contain the information in sections A.3.c.i. through A.3.c.vi. of Part II of this permit:

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. If you had a startup, shutdown, or malfunction during the reporting period and you took actions consistent with your startup, shutdown, and malfunction plan, the compliance report must include the information in 40 CFR 63.10(d)(5)(i);

v. If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, and there are no deviations from the requirements for work practice standards in Table 4 to Subpart WWWW, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period;

vi. If there were no periods during which the continuous monitoring system (CMS), including a continuous emissions monitoring system (CEMS) and an operating parameter monitoring system were out of control, as specified in 40 CFR 63.8(c)(7), a statement that there were no periods during which the CMS was out of control during the reporting period;

vii. For each deviation from a organic HAP emissions limitation (i.e., emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source where you are not using a CMS to comply with the organic HAP emissions limitations or work practice standards in this subpart, the compliance report must contain the information in sections A.3.c.i. through A.3.c.iv. and in sections A.3.vii.(1) and A.3.vii.(2) of Part II of this permit. This includes periods of startup, shutdown, and malfunction.

(1) The total operating time of each affected source during the reporting period.

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

viii. For each deviation from a organic HAP emissions limitation (i.e., emissions limit and operating limit) occurring at an affected source where you are using a CMS to comply with the organic HAP emissions limitation in this subpart, you must include the information in sections A.3.c.i. through A.3.c.iv. and in sections A.3.viii.(1) through A.3.viii.(12) of Part II of this permit. This includes periods of startup, shutdown, and malfunction.

(1) The date and time that each malfunction started and stopped.

(2) The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks.

(3) The date, time, and duration that each CMS was out of control, including the information in 40 CFR63.8(c)(8).

(4) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction, or during another period.

(5) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.

(6) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

(7) A summary of the total duration of CMS downtime during the reporting period and the total duration of CMS downtime as a percent of the total source operating time during that reporting period.

(8) An identification of each organic HAP that was monitored at the affected source.

(9) A brief description of the process units.

(10) A brief description of the CMS.

(11) The date of the latest CMS certification or audit.

(12) A description of any changes in CMS, processes, or controls since the last reporting period.

ix. The permittee must report if the permittee has exceeded the 100 tons/year organic HAP emissions threshold if that exceedance would make your facility subject to 40 CFR 63.5805(b) or 40 CFR 63.5805(d). Include with this report any request for an exemption under 40 CFR 63.5805(e). If the permittee receives an exemption under 40 CFR 63.5805(e) and subsequently exceeds the 100 tons per year organic HAP emissions threshold, the permittee must report this exceedance as required in 40 CFR 63.5805(f).

x. Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in 40 CFR Subpart WWWW in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 in 40 CFR Part 63 Subpart WWWW along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority, Ohio EPA.

xi. Submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in Table 14 of 40 CFR Part 63 Subpart WWWW, and not based on the requirements in 40 CFR 63.999.

4. Record Keeping Requirements - The permittee must keep the records listed in sections A.4.a. through A.4.c. of Part II of this permit.

a. A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).

b. The records in 40 CFR 63.6(e)(3)(iii) through 40 CFR 63.6(e)(3)(v) related to startup, shutdown, and malfunction.

c. Records of performance tests, design, and performance evaluations as required in 40 CFR 63.10(b)(2).

d. If an add-on control device is used, all records must be kept as required in 40 CFR part 63, subpart SS, to show continuous compliance with 40 CFR Part 63 Subpart WWWW.

e. The permittee must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3, 5, and 7 to 40 CFR Part 63 Subpart WWWW.

f. The permittee must keep a certified statement that the permittee is in compliance with the work practice requirements in Table 4 to 40 CFR Part 63 Subpart WWWW, as applicable.

g. For a new or existing continuous lamination/casting operation, the permittee must keep the

records listed in sections A.4.g.i. through A.4.g.iv of Part II of this permit, when complying with the percent reduction and/or lbs/ton requirements specified in paragraphs (a) through (d) of 40 CFR 63.5805.

i. The permittee must keep all data, assumptions, and calculations used to determine percent reduction and/or lbs/ton as applicable;

ii. The permittee must keep a brief description of the rationale for the assignment of an equation or factor to each formula;

iii. When using facility-specific organic HAP emissions estimation equations or factors, the permittee must keep all data, assumptions, and calculations used to derive the organic HAP emissions estimation equations and factors and identification and rationale for the worst-case formula; and

iv. For all organic HAP emissions estimation equations and organic HAP emissions factors, the permittee must keep documentation that the appropriate permitting authority, Ohio EPA, has approved them.

h. The permittee must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1).

i. As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

j. The permittee must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). The permittee can keep the records offsite for the remaining 3 years.

k. The permittee may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

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

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific 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
P044 - Compression mold press no. 23 for reinforced composite plastic parts	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.65 lbs/hr, 39.6 lbs/day and 7.2 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 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 set of wet resin mix charges 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 Recordkeeping 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. The permittee shall maintain records of these work practice inspections for each day of operation.

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

   a. The company identification for each wet mix/preform combination employed;

   b. The weight of each wet mix/preform combination employed, in pounds;

   c. The weight of all wet mix/preform combinations 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 1.65 pounds per hour, and the actual average hourly OC emissions for each such day; and

b. An identification of each day during which the OC emissions from the production materials exceeded 39.6 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 set of wet mix charges 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) 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 standard(s) 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: 1.65 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: 39.6 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_WM_wm/pf) + (Wi_PF_wm/pf)] x EF.

   where:
   E_OC = the daily, OC emissions for all materials, 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: 7.2 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 analysis 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 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, 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).

   The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be 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
P044 - Compression mold press no. 23 for reinforced composite plastic parts		Compliance with the Air Toxic Policy as specified in Section B.III.1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. Modeling the federally regulated pollutant, 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 on April 21, 2003.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None