State of Ohio Environmental Protection Agency

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

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

Application No: 02-18623

DATE: 6/17/2004

MFG Composite Systems Company
Matthew Narducci
P.O. Box 675
Ashtabula, OH 440050675

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, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA NEDO

FINAL PERMIT TO INSTALL 02-18623

Application Number:	02-18623
APS Premise Number:	0204010230
Permit Fee:	**$2000**
Name of Facility:	MFG Composite Systems Company
Person to Contact:	Matthew Narducci
Address:	P.O. Box 675 Ashtabula, OH 440050675

Location of proposed air contaminant source(s) [emissions unit(s)]:
2925 MFG Place
Ashtabula, Ohio

Description of proposed emissions unit(s):
2 polyester resin/styrene paste mixers (no. 4 and no. 5).

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

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
PE	3.06
OC	12.9

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

1. This facility is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) 40 CFR Part 63, Subpart WWWW, the National Emission Standards for Reinforced Plastic Composites Production; as well as, the applicable requirements of the General Provisions of the NESHAPs under Subpart A of part 63. Compliance with all applicable requirements shall be demonstrated by April 21, 2006.

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

a. The methods used to determine compliance;

b. The results of any performance test, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted to demonstrate compliance;

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

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

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

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

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

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

None

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
P039 - Cowles mixer 4 for polyester resin/styrene paste production with a baghouse to control particulate emissions	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.35 lb/hr and 1.53 tons/year. Organic compound (OC) emissions shall not exceed 6.93 lbs/hr, 40 lbs/day, and 7.3 tons/year from production operations. Visible particulate emissions shall not exceed 5% opacity as a 6-minute average. The requirements of this rule also include compliance with the requirements of 40 CFR Parts 63.5780 - 63.5935.
	OAC 3745-17-07(A)(1) OAC 3745-17-11	The requirements of these rules are less stringent than the requirements of OAC rule 3745-31-05(A)(3).
	40 CFR, Part 63, Subpart WWWW	See Sections A.I.2.a, A.III.1, A.III.3, A.III.5, A.IV.2, and Part II Section A.

2. Additional Terms and Conditions

2.a The following work practices shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and as specified in Table 4 of 40 CFR, Part 63, Subpart WWWW:

i. Mixer covers shall have no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation; and

ii. The mixer covers shall be closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

2.b This emissions unit shall be vented to a baghouse shared with emissions unit P040, for control of particulate emissions from polyester resin/styrene paste production. This emissions unit shall not be operated without the baghouse control.

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range recommended by the manufacturer while the emissions unit is in operation or within a range established during the most recent performance test that demonstrated that the emissions unit was in compliance.

III. Monitoring and/or Record keeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of production operations associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practices are employed to minimize HAP emissions. The inspections shall be performed during representative, normal operating conditions and a record of the inspection shall be maintained in an operations log.

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

a. The company identification for each resin/styrene paste material produced in the mixer;

b. The weight of each OC-containing material added to the mixer, in pounds per day;

c. The total OC content of each OC-containing material added to the mixer, in percent by weight;

d. The total OC emissions from each OC-containing material applied in this emissions unit, in pounds per day;

e. The total OC emissions from each polyester resin/styrene paste produced in the mixer, in pounds per day (sum of emissions from all materials in "d");

f. The actual number of hours that the emissions unit was in operation; and

g. The average hourly OC emissions rate for all polyester resin/styrene paste produced, i.e., ("e") divided by ("f"), in pounds per hour (average).

3. The permittee shall collect and record the following information for each day of operation:

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

b. Any dates on which the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.

4. The permittee shall maintain information to document the composition of each OC-containing material applied and each polyester resin/styrene paste material produced in this emissions unit.

5. The permittee shall maintain records of compliance certification statements for the work practice standards, required by 40 CFR 63.5915(d), for 5 years following the date of each record. These semi-annual compliance report(s) shall meet the requirements of 40 CFR 63.5910.

6. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

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 operations exceeded 6.93 pounds per hour, and the actual average hourly OC emissions for each such day;

b. An identification of each day during which the OC emissions from the production operations exceeded 40 pounds per day, and the actual OC emissions for each such day; and

c. An identification of each day during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.1.

2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which shall include a certified statement documenting that (1) the mixer cover has no visible gaps present, other than a gap of up to 1 inch around the mixer shaft and/or around any required instrumentation; and (2) that the mixer covers were closed during all mixing operations, except when materials were being added or when the cover to the mixing vessels was changed and or replaced. The initial compliance report must cover the period beginning on the operations startup

date, as required in 40 CFR 63.5800 and as 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.

Each subsequent compliance report shall cover the semiannual reporting period from January 1 through June 30 and July 1 through December 31, and shall be postmarked no later than July 31 or January 31, the month following each reporting period, as required by 40 CFR 63.5910(b).

Each compliance report shall include the following information:

a. Company name and address;

b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;

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

d. The total operating time of this emissions unit;

e. The date on which any inspection was not conducted as required in Section A.III.1; and

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

g. If there were no deviations from (1) the work practice standards, required by 40 CFR 63.5805(a), (2) the record keeping requirements in Sections A.III., and/or (3) the daily inspection requirements in Section A.III.1, a statement that no deviations occurred during the reporting period.

3. The permittee shall submit annual reports which specify the total OC emissions and the total PE rate from this emissions unit for the previous calendar year. These reports shall be submitted to the Ohio EPA Northeast District Office 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. Emission Limitation: 5% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation: 0.35 lb PE/hr.

Applicable Compliance Method(s): To determine the potential worst case emission rate for particulate matter, the following equation may be used:

E_PE = P x EF x (1 - CE/100).

Where the following applies:

E_PE = PE, in pounds per hour.

P = maximum dry solids throughput rate, 8,680 pounds per hour

EF = emission factor for uncontrolled PE, which is 0.01 pounds of uncontrolled PE per pound of dry solids processed for a semi-covered or covered mixer, per AP-42, Chapter 6.4 (5/83).

CE = control efficiency of the PE control device, 99.9%

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

c. Emission Limitation: 1.53 TPY PE.

Applicable Compliance Method: Compliance shall be demonstrated with the annual emissions limitation for PE, by multiplying the worst case hourly emission rate, as determined in Section A.V.1.b, by the actual hours of operation, as recorded in the record keeping requirements of Section A.III.2.e., and dividing by 2000 lbs/ton.

d. Emissions Limitation: 6.93 lbs OC/hr from production operations.

Applicable Compliance Method: Compliance shall be demonstrated through the record keeping maintained in Section A.III.2. 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 the Ohio EPA.

e. Emissions Limitation: 40 lbs OC/day from production operations.

Applicable Compliance Method: Compliance shall be demonstrated through the record keeping maintained in Section A.III.2. Compliance may be determined based upon the following equation:

EP_OC = summation of [Wi x OCi x EF(OC)].

where:

EP_OC = OC emissions as styrene from the polyester resin/styrene paste mix production operations, in pounds per day.

Wi = the weight of resin paste mix "i" produced, in pounds per day.

OCi = the styrene content of resin paste mix "i", in percent by weight.

EF(OC) = the styrene emissions factor, which is 0.0015 pound of styrene emissions per pound of available styrene content. 1% of available OC/styrene may be generated, per AP-42, Chapter 6.4 (5/83). 88% of generated OC/styrene emissions may be captured within a covered mixer, per a "Marginal Benefit/Impact Analysis: Control Versus Covers to Reduce Resin and Paste Mixing Emissions in the Manufacture of Reinforced Plastic Composites" prepared for Composite Fabricators Association by Environmental Compliance & Risk Management, July, 2000. Following the submittal of the exhaust gas testing report to the Northeast District Office, as required by Section A.V.3, the revised styrene emissions factor shall be employed.

f. Emissions Limitation: 7.3 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the production operations, EP_OC, as recorded in Section A.V.1.e, for the calendar year, and 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).

3. The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months after the startup of operations.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emissions rate(s) for PE and OC (in lbs/hr), the allowable opacity limit for visible PE and to develop a styrene emissions factor, in pounds of styrene emissions per pound of available styrene content.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

i. For the visible PE opacity, Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1); and

ii. For the mass OC rate, Method 25A or Method 18 of 40 CFR Part 60, Appendix A, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate.

Equivalent alternate method(s) U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

f. Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the

test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

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
P039 - Cowles mixer 4 for polyester resin/styrene paste production with a baghouse to control particulate emissions		See Section B.2.a. below.

2. Additional Terms and Conditions

2.a Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not required because this emissions unit is subject to the requirements of 40 CFR, Part 63, Subpart WWWW and the permittee shall comply with the work practice standards for the mixer, as required in this NESHAP.

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P040 - Littleford mixer 5 for polyester resin/styrene paste production with a baghouse to control particulate emissions	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.35 lb/hr and 1.53 tons/year. Organic compound (OC) emissions shall not exceed 1.28 lbs/hr, 30.7 lbs/day and 5.6 tons/year from production operations. Visible particulate emissions shall not exceed 5% opacity as a 6-minute average. The requirements of this rule also include compliance with the requirements of 40 CFR Parts 63.5780 through 63.5935.
	OAC 3745-17-07(A)(1) OAC 3745-17-11	The requirements of these rules are less stringent than the requirements of OAC rule 3745-31-05(A)(3).
	40 CFR, Part 63, Subpart WWWW	See Sections A.I.2.a, A.III.1, A.III.3, A.III.5, A.IV.2 and Part II Section A.

2. Additional Terms and Conditions

2.a The following work practices shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and as

specified in Table 4 of 40 CFR, Part 63, Subpart WWWW:

i. Mixer covers shall have no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation; and

ii. The mixer covers shall be closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

2.b This emissions unit shall be vented to a baghouse shared with emissions unit P039, for control of particulate emissions from polyester resin/styrene paste production. This emissions unit shall not be operated without the baghouse control.

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range recommended by the manufacturer while the emissions unit is in operation or within a range established during the most recent performance test that demonstrated that the emissions unit was in compliance.

III. Monitoring and/or Record keeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of production operations associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practices are employed to minimize HAP emissions. The inspections shall be performed during representative, normal operating conditions and a record of the inspection shall be maintained in an operations log.

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

a. The company identification for each resin/styrene paste material produced in the mixer;

b. The weight of each OC-containing material added to the mixer, in pounds per day;

c. The total OC content of each OC-containing material added to the mixer, in percent by weight;

d. The total OC emissions from each OC-containing material applied in this emissions unit, in pounds per day;

e. The total OC emissions from each polyester resin/styrene paste produced in the mixer, in pounds per day (sum of emissions from all materials in "d");

f. The actual number of hours that the emissions unit was in operation; and

g. The average hourly OC emissions rate for all polyester resin/styrene paste produced, i.e., ("e") divided by ("f"), in pounds per hour (average).

3. The permittee shall collect and record the following information for each day of operation:

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

b. Any dates on which the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.

4. The permittee shall maintain information to document the composition of each OC-containing material applied and each polyester resin/styrene paste material produced in this emissions unit.

5. The permittee shall maintain records of compliance certification statements for the work practice standards, required by 40 CFR 63.5915(d), for 5 years following the date of each record. These semi-annual compliance report(s) shall meet the requirements of 40 CFR 63.5910.

6. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

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 operations exceeded 1.28 pounds per hour, and the actual average hourly OC emissions for each such day;

b. An identification of each day during which the OC emissions from the production operations exceeded 30.7 pounds per day, and the actual OC emissions for each such day; and

c. An identification of each day during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.1.

2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which

shall include a certified statement documenting that (1) the mixer cover has no visible gaps present, other than a gap of up to 1 inch around the mixer shaft and/or around any required instrumentation; and (2) that the mixer covers were closed during all mixing operations, except when materials were being added or when the cover to the mixing vessels was changed and or replaced. The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and as 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.

Each subsequent compliance report shall cover the semiannual reporting period from January 1 through June 30 and July 1 through December 31, and shall be postmarked no later than July 31 or January 31, the month following each reporting period, as required by 40 CFR 63.5910(b).

Each compliance report shall include the following information:

a. Company name and address;

b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;

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

d. The total operating time of this emissions unit;

e. The date on which any inspection was not conducted as required in Section A.III.1; and

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

g. If there were no deviations from (1) the work practice standards, required by 40 CFR 63.5805(a), (2) the record keeping requirements in Sections A.III., and/or (3) the daily inspection requirements in Section A.III.1, a statement that no deviations occurred during the reporting period.

3. The permittee shall submit annual reports which specify the total OC emissions and the total PE rate from this emissions unit for the previous calendar year. These reports shall be submitted to the Ohio EPA Northeast District Office 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. Emission Limitation: 5% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation: 0.35 lb PE/hr.

Applicable Compliance Method(s): To determine the potential worst case emission rate for particulate matter, the following equation may be used:

E_PE = P x EF x (1 - CE/100).

Where the following applies:

E_PE = PE, in pounds per hour.

P = maximum dry solids throughput rate, which is 8,244 pounds per hour as noted in the permit application.

EF = emission factor for uncontrolled PE, which is 0.00333 pounds of uncontrolled PE per pound of dry solids processed for a closed mixer, according to engineering estimates as noted in the application for PTI 02-18623.

CE = control efficiency of the PE control device, in percent which is 99.9 as noted in the permit application.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

c. Emission Limitation: 1.53 TPY PE.

Applicable Compliance Method: To determine the annual rate for PE, the worst case, hourly emission rate as determined in Section A.V.1.b. shall be multiplied by the actual hours of operation, as specified in the record keeping requirements of Section A.III.2.e., and divided by 2000 lbs/ton.

d. Emissions Limitation: 1.28 lbs OC/hr from production operations.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.2. 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.

e. Emissions Limitation: 30.7 lbs OC/day from production operations.

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

EP_OC = summation of [Wi x OCi x EF(OC)].

where:

EP_OC = OC emissions as styrene from the polyester resin/styrene paste mix production operations, in pounds per day.

Wi = the weight of resin paste mix "i" produced, in pounds per day.

OCi = the styrene content of resin paste mix "i", in percent by weight.

EF(OC) = the styrene emissions factor, which is 0.000292 pound of styrene emissions per pound of available styrene content, per results of a U.S. EPA Method 25A test, conducted on September 27, 2001, on a similar resin paste mixer, Jayco Mixer (P025) at Venture Holdings Corporation (02-04-02-0245). Following the submittal of the exhaust gas testing report to the Northeast District Office, as required by Section A.V.3, the revised styrene emissions factor shall be employed.

f. Emissions Limitation: 5.6 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the production operations, EP_OC, as specified in Section A.V.1.e., for the calendar year, and 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).

3. The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months after the startup of operations.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emissions rate(s) for OC (in lbs/hr), the allowable opacity limit for visible PE and to develop a styrene emissions factor, in pounds of styrene emissions per pound of available styrene content.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

i. For the visible PE opacity, Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1); and

ii. For the mass OC rate, Method 25A or Method 18 of 40 CFR Part 60, Appendix A, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate.

Equivalent alternate method(s) U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

f. Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid

characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

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
P040 - Littleford mixer 5 for polyester resin/styrene paste production with a baghouse to control particulate emissions		See Section B.2.a. below.

2. Additional Terms and Conditions

2.a Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not required because this emissions unit is subject to the requirements of 40 CFR, Part 63, Subpart WWWW and the permittee shall comply with the work practice standards for the mixer, as required in this NESHAP.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Emissions Unit ID: **P040**

NEW SOURCE REVIEW FORM B

PTI Number: 02-18623 Facility ID: 0204010230

FACILITY NAME MFG Composite Systems Company

FACILITY DESCRIPTION mfg. of reinforced composite plastic parts CITY/TWP Ashtabula

SIC CODE 3089 SCC CODE 3-08-007-99 EMISSIONS UNIT ID P039

EMISSIONS UNIT DESCRIPTION Cowles mixer 4 for polyester resin/styrene paste production with a bag house to control particulate emissions

DATE INSTALLED upon permit issuance

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.0434 lb/hr	0.18	0.35 lb/hr	1.53
PM_{10}	unclassified				
Sulfur Dioxide	attainment				
Organic Compounds	attainment	2.07 lbs/hr 40 lbs/day	7.14	6.93 lbs/hr 40 lbs/day	7.3
Nitrogen Oxides	attainment				
Carbon Monoxide	attainment				
Lead	attainment				
Other: Air Toxics	unclassified				

APPLICABLE FEDERAL RULES:

NSPS? No. NESHAP? WWWW PSD? No. OFFSET POLICY? No.

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

Enter Determination 5% opacity is same BAT for similar mixer P025, PTI 02-12229 at Venture Holdings . 0.35 lb PE/hr based on 0.01 grain PE/dscf x 115% to allow for error in making air pollutant emissions estimates. 6.93 lbs OC/hr is 115% of maximum, uncontrolled rate, to allow for a conservative estimate and assuming 28.7% max. styrene content x 14,000 lbs max. paste/hr x 0.0125 lb OC/lb available styrene emissions factor for a covered mixer. 40 lbs OC/day based on compliance w. OAC rule 3745-21-07(G)(2). 40 lbs OC/day x 8760 hr/yr = 7.3 TPY. BAT is also employment of work practice standards required by MACT, Subpart WWWW: use mixer covers w. no visible gaps, except $\leq$ 1 inch around mixer shaft and keep mixer cover closed during mixing, except when adding materials or changing mix vessels.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No. All OC is styrene which is regulated by a new MACT, Subpart WWWW, promulgated on 04/21/03.

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

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

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: NA.

NEW SOURCE REVIEW FORM B

PTI Number: 02-18623 Facility ID: 0204010230

FACILITY NAME MFG Composite Systems Company

FACILITY DESCRIPTION mfg. of reinforced composite plastic parts CITY/TWP Ashtabula

Emissions Unit ID: **P040**

SIC CODE 3089 SCC CODE 3-08-007-99 EMISSIONS UNIT ID P040

EMISSIONS UNIT DESCRIPTION Littleford mixer 5 for polyester resin/styrene paste production with a baghouse to control particulate emissions

DATE INSTALLED upon permit issuance

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.023 lb/hr	0.10	0.35 lb/hr	1.53
PM_{10}	unclassified				
Sulfur Dioxide	attainment				
Organic Compounds	attainment	0.63 lbs/hr 15.1 lbs/day	2.70	1.28 lbs/hr 30.7 lbs/day	5.6
Nitrogen Oxides	attainment				
Carbon Monoxide	attainment				
Lead	attainment				
Other: Air Toxics	unclassified				

APPLICABLE FEDERAL RULES:

NSPS? No. NESHAP? WWWW PSD? No. OFFSET POLICY? No.

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

Enter Determination 5% opacity is same BAT for similar mixer P025, PTI 02-12229 at Venture Holdings . 0.35 lb PE/hr based on 0.01 grain PE/dscf x 115% to allow for error in making air pollutant emissions estimates. 1.28 lbs OC/hr & 30.7 lbs OC/day is 115% of maximum, uncontrolled rate, to allow for a conservative estimate and assuming 28.7% max. styrene content x 13,297 lbs max. paste/hr x 0.000292 lb OC/lb available styrene emissions factor for a closed mixer. 30.7 lbs OC/day x 8760 hr/yr = 5.6 TPY. BAT is also employment of work practice standards required by MACT, Subpart WWWW: use mixer covers w. no visible gaps, except ≤ 1 inch around mixer shaft and keep mixer cover closed during mixing, except when adding materials or changing mix vessels.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No. All OC is styrene which is regulated by a new MACT, Subpart WWWW, promulgated on 04/21/03.

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: NA