



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

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: 02-19408

Fac ID: 0204010230

DATE: 3/31/2005

MFG Composite Systems Company
Matthew Narducci
P.O. Box 675
Ashtabula, OH 44005-0675

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, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: USEPA

NEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 3/31/2005
Effective Date: 3/31/2005**

FINAL PERMIT TO INSTALL 02-19408

Application Number: 02-19408
Facility ID: 0204010230
Permit Fee: **\$200**
Name of Facility: MFG Composite Systems Company
Person to Contact: Matthew Narducci
Address: P.O. Box 675
Ashtabula, OH 44005-0675

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

Description of proposed emissions unit(s):
Cleanup of portable, metal machine parts used in reinforced plastic composites production.

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 emission limitations, operational restrictions, and control device operating parameter limitations, 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.

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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

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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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	25.7

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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:
 1. The name and address of the owner or operator;
 2. The address (i.e., physical location) of the affected source;
 3. An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date;
 4. 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
 5. A statement of whether the affected source is a major source or an area source.
3. Semi-Annual Compliance Report Requirements
 1. 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).

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2. 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.

3. 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 CFR 63.8(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 try 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 4.a.i. through 4.a.iii of Part II of this permit.

1. 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).

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

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

4. 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.

5. 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.

6. 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.

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7. 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.

v. 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).

vi. 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.

vii. 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.

viii. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P041 - Cleanup of portable, metal machine parts used in reinforced plastic composites production: all operations	OAC rule 3745-31-05(A)(3) 40 CFR, Part 63, Subpart WWWW	The organic compound (OC) emissions rate shall not exceed 4,283 lbs/month and 25.7 tons/year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(O). See sections A.II.1. and A.II.2. The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3). See Part II section A.
two cold cleaners (tank nos. 1 & 2)	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-09(O)	See sections A.2.a. and A.2.b. The requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
two wipe cleaning operations (mix room wipe cleaning & SMC room wipe cleaning)	OAC rule 3745-31-05(A)(3)	See sections A.2.c., A.2.d. and A.II.3.

2. Additional Terms and Conditions

Cold Cleaner Requirements

- 2.a** The following design specifications shall be installed, operated and maintained at each cold cleaner to minimize OC emissions from the unit:
- i. Each cold cleaner shall be fitted with a cover, which shall remain closed at all times, except when parts are being handled or solvent is being added or removed.
 - ii. Each cold cleaner shall be equipped with a device for draining the cleaned parts; and the drainage device shall be constructed internally so that parts are enclosed under the cover during draining.
 - iii. Each cold cleaner shall be maintained with a freeboard ratio equal to or greater than 0.7. (Freeboard ratio means the freeboard height divided by the width of the degreaser air/solvent area.) The minimum freeboard height, the distance from the solvent surface to the top edge of the degreaser tank, shall be marked for easy identification by the operator(s).
- 2.b** Each cold cleaner shall be operated and maintained in accordance with the following work practices to minimize OC emissions from the unit:
- i. A permanent, legible, conspicuous label, summarizing the operating requirements and the operating restrictions shall be maintained near or attached to the cold cleaner.
 - ii. Waste solvent shall be stored in covered containers, except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety. [Note this requirement is equivalent to the work practice standard required by Table 4 to Subpart WWWW and by 40 CFR 63.5805(a) to keep HAP-containing storage tanks closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.]
 - iii. The cold cleaner tank shall be filled and operated when the solvent level is at or below the minimum freeboard height.
 - iv. The cover shall remain closed whenever parts are not being handled in the cleaner.
 - v. Cleaned parts shall drain until dripping ceases.
 - vi. If a solvent dispenser device is used, it shall be equipped to dispense a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge.
 - vii. Porous and/or absorbent materials shall not be cleaned in the cold cleaner.

Wipe Cleaning Operations

- 2.c** The following design specification shall be installed, operated and maintained at each wipe

cleaning station to minimize OC emissions from the unit(s): each wipe cleaning solvent container shall be fitted with a cover, which shall remain closed at all times, except when cleaning tools (i.e. rags) are inserted to or withdrawn from it, or solvent is being added or removed.

2.d Each wipe cleaning solvent container shall be operated and maintained in accordance with the following work practices to minimize OC emissions from the unit:

- i. A permanent, legible, conspicuous label, summarizing the operating requirements and the operating restrictions shall be maintained near or attached to the wipe cleaning solvent container.
- ii. Waste solvent shall be stored in covered containers, except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety. [Note this requirement is equivalent to the work practice standard required by Table 4 to Subpart WWWW and by 40 CFR 63.5805(a) to keep HAP-containing storage tanks closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.]
- iii. The cover shall remain closed at all times, except when cleaning tools (i.e. rags) are inserted to or withdrawn from the wipe cleaning solvent container, or solvent is being added or removed.

II. Operational Restrictions

All Cleaning Operations

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), is prohibited.
2. The use of solvents, containing hazardous air pollutant (HAP) compounds (i.e. methylene chloride, tetrachloroethylene, trichloroethylene, 1,1,2-trichloroethane, carbon tetrachloride, chloroform, styrene or methylmethacrylate) is prohibited. [Note this requirement is more stringent than the work practice standard required by Table 4 to Subpart WWWW and by 40 CFR 63.5805(a) to prohibit use of HAP materials at cleaning operations, except in closed systems.]

Wipe Cleaning Operations

3. Cleanup of parts with an OC-containing solvent by spraying, brushing, flushing, agitation or immersion within a wipe cleaning solvent container is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of each cleanup operation associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practices, specified in sections A.I.2.b. and A.I.2.d., to minimize OC 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 maintain monthly records of the following information for each cleanup operation:
 - a. the identification of solvents employed in each cold cleaner and each wipe cleaning operation, including, at a minimum, the chemical name(s);
 - b. the OC content of each solvent used in each cold cleaner and each wipe cleaning operation, in lbs/gallon;
 - c. the amount of solvent added to each cold cleaner and each wipe cleaning operation, in gallons;
 - d. the total amount of each solvent added to all cleanup operations, in gallons;
 - e. the total amount of solvent collected from all cleanup operations for disposal and sent off-site, in gallons;
 - f. the total amount of solvent collected from all cleanup operations for recovery and sent off-site, in gallons;
 - g. the average OC content of the waste solvent, collected from all cleanup operations for disposal and sent off-site, in lbs/gallon as determined from methods specified in section A.V.3.;
 - h. the average OC content of the waste solvent, collected from all cleanup operations for recovery and sent off-site, in lbs/gallon as determined from methods specified in section A.V.3.; and
 - i. the OC emissions, in pounds.
3. The permittee shall maintain information to document that each solvent employed in any operation in this emissions unit is non-photochemically reactive.
4. The permittee shall maintain information to document that each cleanup solvent employed in any operation in this emissions unit has no HAP content.
5. The permittee shall maintain information to document the vapor pressure of each cleanup solvent employed in each cold cleaner, in pound per square inch absolute, measured at 100 degrees Fahrenheit.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each month during which the OC emissions exceeded 4,283 lbs/month, and the actual monthly OC emissions for each such month;
 - b. an identification of each day during which any cold cleaner work practices were not employed as required in section A.I.2.b., for example;
 - i. Waste solvent was stored in open or partially covered containers, excluding periods when the addition or removal of materials occur;
 - ii. The cold cleaner tank was filled and operated when the solvent level was above the minimum freeboard height.
 - iii. The cold cleaner cover did not remain closed at all times, excluding periods of time when parts are inserted to or withdrawn from the cold cleaner tank or when solvent is being added or removed.
 - iv. Cleaned parts were not drained until dripping ceased.
 - v. If a solvent dispenser device was used, it was not equipped to dispense a solid fluid stream (rather than a fine, atomized, or shower-type spray) and/or the solvent stream was dispensed at a pressure that exceeded 10 pounds per square inch gauge.
 - vi. Porous and/or absorbent materials were cleaned in the cold cleaner.
 - c. an identification of each day during which any wipe cleaning work practices were not employed as required in section A.I.2.d., for example;
 - vii. Waste solvent was stored in open or partially covered containers, excluding periods when the addition or removal of materials occur; and
 - viii. The cover was not closed at all times, excluding periods of time when cleaning tools (i.e. rags) were inserted to or withdrawn from the wipe cleaning solvent container, or solvent was added or removed.
 - d. an identification of each month during which any photochemically reactive solvents were

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employed at any cleaning operation; and

- e. an identification of each month during which any solvents with a HAP content were employed at any cleaning operation.
2. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(a), which include certified statements in the notice of compliance status that state the following regarding work practice standards:

- a. no HAP containing cleaning solvents were used; and
- b. all HAP-containing waste solvent was stored in covered containers, except during the addition or removal of materials, and that bulk HAP-containing materials storage tanks were vented only as necessary for safety.

Each 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 and as specified in Part II, section A.3.

3. The permittee shall submit annual reports which specify the total OC emissions 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: 4,283 lbs OC/month from all cleanup operations.

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

$$E(OC) = [\text{summation of } (V_{i\text{DISPENSED}} \times OC_{i\text{DISPENSED}})] - \{[\text{summation of } (V_{i\text{DISPOSED}} \times OC_{i\text{DISPOSED}})] + [\text{summation of } (V_{i\text{RECLAIMED}} \times OC_{i\text{RECLAIMED}})]\}, \text{ when } i = 1 \text{ through } m.$$

where:

$E(OC)$ = OC emissions from all cleanup operations, in pounds per month.

$V_{i\text{DISPENSED}}$ = the total volume of cleanup solvent, i , dispensed at all cleanup operations, as specified in section A.III.2.d., in gallons per month.

$OC_{i\text{DISPENSED}}$ = the OC content of dispensed cleanup solvent, i , as determined from methods required by section A.V.2., in per pounds per gallon.

$V_{i\text{DISPOSED}}$ = the total volume of waste cleanup solvent, i , collected from all cleanup operations for disposal and sent off-site, as specified in section A.III.2.e., in gallons per month.

$OC_{i\text{DISPOSED}}$ = the average OC content of waste cleanup solvent, i , collected from all cleanup operations for disposal and sent off-site, as determined from methods required by section A.V.3., in per pounds per gallon.

$V_{i\text{RECLAIMED}}$ = the total volume of waste cleanup solvent, i , collected from all cleanup

operations for recovery and sent off-site, as specified in section A.III.2.f., in gallons per month.

$OC_{i\text{RECLAIMED}}$ = the average OC content of waste cleanup solvent, i , collected from all cleanup operations for recovery and sent off-site, as determined from methods required by section A.V.3., in per pounds per gallon.

m = the number of different cleanup solvents used during the month.

- b. Emissions Limitation: 25.7 tons/year OC from all cleanup operations.

Applicable Compliance Method: Compliance shall be based on the sum of the monthly OC emissions rates from all cleanup operations, $E(OC)$, as specified in section A.IV.1.a. for the calendar year, divided by 2,000 pounds/ton.

2. Any analysis of a cleaning solvent material shall be based on the material as employed (dispensed) at a cleanup operation. The permittee shall determine the composition of the dispensed cleaning solvent material(s) 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. Equivalent, alternative method(s) (as approved by Ohio EPA) may be 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, chemical analysis of each waste cleanup solvent stream generated at this emissions unit (i.e. disposed waste cleanup solvent and "reclaimed" waste cleanup solvent) and maintain records of the analytical results in the following manner:
- a. Chemical analysis of each waste cleanup solvent stream shall be performed by either the permittee or a contractor retained by the permittee.
- b. Within the first four months of startup operations of this modified emissions unit, chemical compound(s) analysis on each waste cleanup solvent stream shall be performed once per month for three (3) months to determine the content of the dispensed cleanup solvent components within the waste cleanup solvent stream. If these analyses show little

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variability in the composition, and resulting emissions estimates, as specified in section A.V.1.a., indicate consistent compliance with the monthly OC emissions limit, then no further analyses will be required, unless there are changes in operations that would significantly change the dispensed cleanup solvent components content of the waste cleanup solvent stream(s).

- c. The analyses shall be conducted to determine an average dispensed cleanup solvent components content, less water and less any organic component in the polyester resin/styrene paste waste, as a weight fraction of each waste cleanup solvent stream and in pounds per gallon, of three monthly composite samples. Also the analyses results can be used to demonstrate compliance with the allowable mass emissions rate(s) for OC, in lbs/month.
- d. Each composite sample from each waste cleanup solvent stream generated at this emissions unit shall not be mixed with other wastes generated from other emissions unit(s). Proportionate volumes of waste solvent material will be extracted from each storage container within each waste cleanup solvent stream in accordance with the representative sampling methods specified in 40 CFR 261, Appendix I or as specified by an equivalent, alternative method(s) (as approved by Ohio EPA).
- e. The following test method(s) shall be employed to determine the dispensed cleanup solvent components content of each composite sample : 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. The styrene content, determined by ASTM D 4827-93 or ASTM D 4747-87, and any water content would be subtracted from the volatile matter content. Equivalent, alternative method(s), as approved by Ohio EPA may be performed on the material(s).
- f. The test(s) shall be conducted while the emissions unit is operating under normal, representative conditions, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
- g. Not later than 30 days prior to the first proposed analysis 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 analyses.
- h. A comprehensive written report on the results of the analyses shall be signed by the person or persons responsible for the analyses and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the third sampling. 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.

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VI. Miscellaneous Requirements

1. PTI 02-19408 is a Chapter 31 modification to allow OC emissions rates above the potential OC emissions rates that were associated with the current, non-insignificant emissions units (cold cleaners Z021 and Z026) and wipe cleaning operations. Two new cold cleaners will be installed to replace the two cold cleaners that are currently in operation, so that P041 may be considered a modified emissions unit.
2. Although no HAP containing cleaning solvents will be allowed for use, the polyester resin/styrene paste on the portable metal parts do contain a HAP, specifically styrene. Therefore all cleaning operations can generate HAP-containing waste solvent.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Cleanup of portable, metal machine parts used in reinforced plastic composites production: two cold cleaners (tank nos. 1 & 2), and two wipe cleaning operations (mix room wipe cleaning & SMC room wipe cleaning).		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 pollutants, i.e. styrene, a hazardous air pollutant (HAP) within the polyester resin/styrene paste waste generated at production operations, or other pollutants from any affected (regulated) operation, i.e. ethyl acetate at cleanup operations 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.

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IV. Reporting Requirements

None.

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V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.