



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

Application No: 02-22745

Fac ID: 0204010230

DATE: 5/22/2008

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

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$825** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

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

CC: USEPA

NEDO

Eastgate Dev. & Trans. Study

NY

PA

ASHTABULA COUNTY

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **02-22745** FOR AN AIR CONTAMINANT SOURCE
FOR **MFG Composite Systems Company**

On 5/22/2008 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **MFG Composite Systems Company**, located at **2925 MFG Place, Ashtabula, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-22745:

Modification to P007 and P029 to change record keeping requirements. Installation of operations to cleanup equipment used for reinforced composite plastics manufacture.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087
[(330)425-9171]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 02-22745

Application Number: 02-22745
Facility ID: 0204010230
Permit Fee: **To be entered upon final issuance**
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):

Modification to P007 and P029 to change record keeping requirements. Installation of operations to cleanup equipment used for reinforced composite plastics manufacture.

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

Chris Korleski
Director

MFG Composite Systems Company
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Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0204010230

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

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reports shall be submitted (i.e., postmarked) quarterly, 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 (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, 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. If this permit is for an emissions unit located at a Title V facility, then 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.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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

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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 re-issuance, or modification
- 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, 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 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.

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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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

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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 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 and the State and by citizens (to the extent allowed by section 304 of the Act) 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.

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- 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 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in

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this permit.

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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 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 (i.e., postmarked) quarterly, 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. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of

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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)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.

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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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

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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>Current</u> <u>Tons Per Year</u>	<u>Proposed</u> <u>Tons/Year</u>	<u>Net Change</u> <u>Tons Per Year</u>
OC	25.555	77.4	51.845
PE	8.63	8.63	0

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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. In accordance with 40 CFR 63.5800 and Table 2 of 40 CFR Part 63, Subpart WWWW, the following emissions units located at this facility are subject to 40 CFR Part 63, Subpart WWWW-- National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production:

P007 - Sheet Mold Compound (SMC) machine;

P029 - Resin paste/wet mix mixer no. 3; and

P047 - Cleanup of equipment used for fiberglass reinforce composite plastics manufacture.

The above list is not comprehensive and refers to the emissions units within this Permit to Install.

2. 40 CFR Part 63, Subpart A - General Provisions Applicability to 40 CFR Part 63, Subpart WWWW - The permittee is subject to the following requirements specified in 40 CFR Part 63, Subpart A as listed in Table 15 of 40 CFR Part 63, Subpart WWWW:

Parts 63.1 (a)(1)-(4), 63.1(a)(6), 63.1 (a)(10)-(14), 63.1(b)(1), 63.1 (b)(3), 63.1 (c)(1) and (2), 63.1 (c)(5), 63.1 (e), 63.2, 63.3, 63.4, 63.5 (a)(1) and (2), 63.5(b)(1), 63.5(b)(3) and (4), 63.5 (b)(6), 63.5 (d)(1) and (2), 63.5 (d)(4), 63.5 (e)(1) - (5), 63.5 (f)(1) and (2), 63.6 (a)(1) and (2), 63.6 (b)(1)-(5), 63.6 (b)(7), 63.6 (c)(1) and (2), 63.6 (c)(5), 63.6 (f)(2) and (3), 63.6 (g)(1) - (3), 63.6 (i)(1)-(14), 63.6 (i)(16), 63.6 (j), 63.7 (a)(1), 63.7 (a)(3), 63.7 (b)(1) and (2), 63.7 (c), 63.7 (d), 63.7(e), 63.7 (f), 63.7 (g), 63.7 (h), 63.8 (a)(1) and (2), 63.8 (a)(4), 63.8 (b)(1) - (3), 63.8 (g)(1) - (5), 63.9 (a)(1)-(4), 63.9 (b)(1) and (2), 63.9 (b)(4)(i), 63.9 (b)(4)(v), 63.9 (b)(5), 63.9(c), 63.9 (d), 63.9 (e), 63.9 (h)(1) - (3), 63.9 (h)(5) and (6), 63.9 (i), 63.9(j), 63.10 (a), 63.10 (b)(1), 63.10 (d)(1) and (2), 63.10 (d)(4), 63.10 (f), 63.12, 63.13, 63.14, and 63.15.

The following emissions units are subject to the aforementioned requirements: P007, P029 and P047.

Monitoring and Record Keeping

3. In accordance with 40 CFR 63.5915, the permittee must maintain a copy of the following records.

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- a. The permittee must maintain a copy of each notification and report submitted to comply with Subpart WWWW of 40 CFR Part 63, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted.
 - b. The permittee must maintain a certified statement of compliance with the work practice requirements in Table 4 to Subpart WWWW of 40 CFR Part 63.
4. In accordance with 40 CFR 63.5920, all applicable records must be maintained in such a manner that they can be readily accessed and are suitable for inspection according to 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. 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. The records may be kept offsite for the remaining 3 years. Records may be kept in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

Reports and Notifications

5. As required by 40 CFR 63.5905(b), the permittee submitted an Initial Notification containing the information specified in 40 CFR 63.9 (b)(4) and (5), signed on July 21, 2003. If there is a change in any information submitted in the Initial Notification, the permittee must submit the changes in writing to the Administrator within 15 calendar days after the change.
6. In accordance with 40 CFR 63.5910, the permittee must submit semiannual compliance reports.
 - a. The first compliance report must cover the period beginning on April 21, 2006, and ending on December 31, 2006. The first compliance report must be postmarked or delivered no later than January 31, 2007.
 - b. 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 semiannual compliance report shall be postmarked or delivered no later than January 31 and July 31, whichever date is the first date following the end of the semiannual reporting period.
7. In accordance with 40 CFR 63.5910, each semiannual compliance report must contain the following information.

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- a. the company name and address;
 - b. a 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. the date of the report and the beginning and ending dates of the reporting period;
 - d. if there are no deviations from any organic HAP emission limit and from any work practice standards in this subpart, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period; and
 - e. for each deviation from any organic HAP emission limit and for each deviation from the requirements for work practice standards, the compliance report must contain the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.
8. In accordance with 40 CFR Part 63.5910(g), 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 Part 63, 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 of 40 CFR Part 63, Subpart WWWW or pursuant to 40 CFR Subpart PPPP along with, or as part of, the semiannual monitoring report required by 40 CFR Part 70.6(a)(3)(iii)(A) or 40 CFR Part 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 40 CFR Part 63, Subpart WWWW, 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.
9. In accordance with 40 CFR 63.5905(b), if there is a change in any information submitted in any notification, the change must be submitted in writing to the Administrator within 15 calendar days after the change.

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 operation(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 -(P007) - Sheet Mold Compound (SMC) machine - administrative modification of PTI 02-11578, issued on 4-8-98 and modified on 7-22-98 and on 3-3-05

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions from the production operation shall not exceed 40 lbs/day and 7.3 tpy. The requirements of this rule also include the requirements of 40 CFR Parts 63.5780-63.5935.
OAC rule 3745-21-07(G)(2)	Emissions of photochemically reactive OC shall not exceed 8 lbs/hr and 40 lbs/day. See sections A.I.2.c and A.VI.1.
40 CFR Part 63, Subpart WWWW	See sections A.I.2.a, A.I.2.b and Part II, sections A.1 through A.9.

2. Additional Terms and Conditions

- 2.a In accordance with 40 CFR 63.5835 and Table 4 of 40 CFR Part 63, Subpart WWWW, the permittee shall close or cover the resin delivery system to the doctor box. The doctor box itself may be open.
- 2.b In accordance with 40 CFR 63.5835 and Table 4 of 40 CFR Part 63, Subpart WWWW, the permittee shall use a nylon containing film to enclose SMC.
- 2.c The OC emission limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive coatings or clean up materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in sections A.III.1.a, A.III.1.b, A.IV.1.a and A.V.1.a shall be void.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the average hourly OC emissions rate from all mold compounds, in pounds per hour (average), as specified in section A.V.1.a;
 - b. the number of hours the emissions unit was in operation; and
 - c. the total OC emissions rate from all mold compounds, in pounds per day, as specified in section A.V.1.b.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, sections A.III.1.a and b will be voided entirely.]
2. The permittee shall conduct daily inspections of this emissions unit and maintain a log of these inspections. The log shall indicate the compliance status of each work practice standard identified in sections A.I.2.a and A.I.2.b and shall contain the following information:
 - a. whether the emissions unit was in operation;
 - b. whether the resin delivery system to the doctor box was closed or covered; and
 - c. whether a nylon containing film was employed to enclose the SMC.
3. In accordance with 40 CFR 63.5835 and Table 4 of 40 CFR Part 63, Subpart WWWW, the records specified in section A.III.2 shall also include information on the duration and cause of each deviation and the corrective action taken. These records shall be maintained as specified in Part II.
4. Modeling the federally regulated pollutant, styrene, a HAP, from the production operations to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03(F)(4)(b) is not necessary upon permittee certification of compliance with 40 CFR Part 63, Subpart WWWW.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Ohio EPA Northeast District Office that identify all exceedances. The reports shall include the

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following information:

- a. an identification of each day during which the average OC emissions exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
- b. an identification of each day during which the OC emissions exceeded 40 pounds, and the actual daily OC emissions for each such day;

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, section A.IV.1.a will be voided entirely.]

In accordance with 40 CFR 63.5910(g), the deviation reports pursuant to the record keeping requirements specified in section A.III.1 shall be submitted in accordance with the requirements specified in Part II.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

8 lbs OC/hr

Applicable Compliance Method:

Compliance shall be based upon the measured volatile organic compound emissions rate, which was determined to be 3.0 lbs VOC/hr, during an average 878.3 lbs OC/hr throughput, via U.S EPA Methods 25A and 204 tests conducted on September 12 through 14, 2006.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, section A.V.1.a will be voided entirely.]

- b. Emission Limitation:

40 lbs OC/day

Applicable Compliance Method(s):

Compliance shall be determined based upon the following equation:

$$E(\text{lbs/day}) = E(\text{lbs/hr}) \times \text{hrs/day}$$

where:

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$E(\text{lbs/day}) = \text{total, daily OC emissions, in pounds per day;}$

$E(\text{lbs/hr}) = \text{the measured volatile organic compound emissions rate was determined to be 3.0 lbs VOC/hr, during an average 878.3 lbs OC/hr throughput, via U.S EPA Methods 25A and 204 tests conducted on September 12 through 14, 2006; and}$

$\text{hrs/day} = \text{the number of hours the emissions unit was in operation, based upon the record keeping requirements specified in section A.III.1.}$

c. Emission Limitation:

7.3 tpy OC

Applicable Compliance Method(s):

Compliance shall be based on the summation of the daily OC emission rates required by the record keeping requirements specified in section A.III.1 for the calendar year, divided by 2,000 pounds per 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. According to 40 CFR 63.5860(a) and Table 9 of 40 CFR Part 63, Subpart WWWW, the permittee must demonstrate initial compliance with the work practice standard(s), specified in sections A.I.2.a and A.I.2.b. Initial compliance has been demonstrated if

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the permittee submits a certified statement in the notice of compliance status that includes the following statements:

- a. the resin delivery system to the doctor box shall be closed or covered. The doctor box itself may be open.
- b. a nylon containing film shall be used to enclose the SMC.

Emissions Unit ID: P007

VI. Miscellaneous Requirements

1. The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install (PTI 02-15578) issued on 4-8-98 and modified on 7-22-98 and on 3-3-05.
2. Emissions from cleanup of equipment associated with this emissions unit shall be attributed to (P047) Cleanup of equipment used for fiberglass reinforced composite plastics manufacture.

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 - (P007) - Sheet Mold Compound (SMC) machine - administrative modification of PTI 02-11578, issued on 4-8-98 and modified on 7-22-98 and on 3-3-05

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-21-07 (M)(5)(h)	This emissions unit is exempt from the emission limitation specified in OAC rule 3745-21-07(M)(3)(g).

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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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 operation(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 - (P029) - SMC paste/wet mix mixer no. 3 with a baghouse (Co. ID. American Air Filter baghouse) to control particulate emissions - administrative modification of PTI 02-11578, issued on 4-8-98 and modified on 7-22-98 and on 3-3-05

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 1.97 lbs/hr and 8.63 tpy. Organic compound (OC) emissions shall not exceed 40 lbs/day and 7.3 tpy. The requirements of this rule also include the requirements of 40 CFR Parts 63.5780 through 63.5935.
OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
OAC rule 3745-17-11	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-07(G)(2)	Exempt from the mass emissions and control requirements due to no chemical reaction taking place in this emissions unit due to Ohio Supreme Court decision of July 11, 2001 and the Ohio EPA permitting call held on July 18, 2002.
40 CFR Part 63, Subpart WWWW	See sections A.I.2.a through A.I.2.c and Part II, sections A.1 through A.9.

2. Additional Terms and Conditions

- 2.a In accordance with 40 CFR 63.5835 and Table 4 of 40 CFR Part 63, Subpart WWWW, this emissions unit shall employ mixer covers with no visible gaps

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present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.

2.b In accordance with 40 CFR 63.5835 and Table 4 of 40 CFR Part 63, Subpart WWWW, the permittee shall keep the mixer covers closed while mixing except when adding materials or changing covers to the mixing vessels.

2.c In accordance with 40 CFR 63.5835 and Table 4 of 40 CFR Part 63, Subpart WWWW, the permittee shall close any mixer vent when mixing, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety.

II. Operational Restrictions

1. The emissions from this emissions unit shall be vented to the baghouse (American Air Filter) at all times the emissions unit is in operation.
2. The pressure drop across the baghouse (American Air Filter) 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. The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

Whenever the monitored value for the pressure drop deviates from the limit or range specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and

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- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification of a Title V operating permit.

- 2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the total OC emissions rate from all SMC pastes and wet mixes, in pounds per day, as specified in section A.V.1.d.
- 3. In accordance with 40 CFR 63.5835 and Table 4 of 40 CFR Part 63, Subpart WWWW, the permittee shall conduct a daily inspection of this emissions unit and maintain a log of these inspections. The log shall include the compliance status of each work practice standard identified in sections A.I.2.a, A.I.2.b and A.I.2.c and shall also include the following information:
 - a. whether the emissions unit was in operation;
 - b. whether the mixer cover is employed, except when adding materials or changing covers to the mixing vessels;

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- c. whether there is a visible gap present in the mixer cover, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation; and
 - d. whether the mixer vent is open, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety.
4. In accordance with 40 CFR 63.5835 and Table 4 of 40 CFR Part 63, Subpart WWWW, the records specified in section A.III.4 shall also include information on the duration and cause of each deviation and the corrective action taken. These records shall be maintained as specified in Part II.
5. Modeling the federally regulated pollutant, styrene, a HAP, from the production operations to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03(F)(4)(b) is not necessary upon permittee certification of compliance with 40 CFR Part 63, Subpart WWWW.

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the baghouse (American Air Filter) during the operation of the emissions unit(s):
 - a. each period of time when the pressure drop across the baghouse was outside of the acceptable range;
 - b. an identification of each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall submit quarterly deviation (excursion) reports to the Ohio EPA Northeast District Office that identify all exceedances. The reports shall include an identification of each day during which the OC emissions exceeded 40 pounds, and the actual daily OC emissions for each such day.
3. In accordance with 40 CFR 63.5910(g), the deviation reports pursuant to the record keeping requirements specified in sections A.III.4 and A.III.5 shall be submitted in accordance with the requirements specified in Part II.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), Appendix A, U.S. EPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation:

PE shall not exceed 1.97 lbs/hr.

Applicable Compliance Method:

To determine the potential worst case, hourly PE rate, the following equation may be used:

$$E_{PE} = P \times EF \times (1 - CE/100)$$

where:

E_{PE} = particulate emissions, in pounds per hour;

P = maximum dry solids throughput rate, 1,935 pounds per hour;

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

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

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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 through 5.

c. Emission Limitation:

PE shall not exceed 8.63 tpy.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the worst case hourly PE 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.3, and then dividing by 2,000 pounds per ton.

d. Emission Limitation:

OC emissions shall not exceed 40 lbs/day.

Applicable Compliance Method:

Compliance may be based on the following equation:

Determination of daily OC emissions:

$$E(\text{lbs/day}) = E(\text{lbs/hr}) \times \text{hrs/day}$$

where:

$E(\text{lbs/day})$ = total, daily OC emissions, in pounds per day;

$E(\text{lbs/hr})$ = 0.96 pound of volatile organic compound emissions per hour as derived from June 19, 2007 U.S. EPA Methods 25A and 204F test results for an identical emissions unit, (P045) resin/paste mixer no. 8; and

hrs/day = the number of hours the emissions unit was in operation, based upon the record keeping requirements specified in section A.III.2.

If required, equivalent, alternative method(s), as approved by Ohio EPA, shall be employed.

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e. Emission Limitation:

OC emissions shall not exceed 7.3 tpy.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be based on the summation of the daily OC emission rates, required by the record keeping requirements specified in section A.III.2 for the calendar year, divided by 2,000 pounds per 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. In accordance with 40 CFR 63.5860(a) and Table 9 of 40 CFR Part 63, Subpart WWWW, the permittee must demonstrate initial compliance with the work practice standard(s), specified in sections A.I.2.a through A.I.2.c. Initial compliance has been demonstrated if the permittee submits a certified statement in the notice of compliance status that includes the following statements:
- a. Mixer covers, with no visible gaps present in the mixer covers, shall be employed except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
 - b. Mixer covers shall be kept closed while mixing except when adding materials or changing covers to the mixing vessels.
 - c. Mixer vents shall be kept closed when mixing, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety.

VI. Miscellaneous Requirements

Emissions Unit ID: P029

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1. The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install (PTI 02-15578) issued on 4-8-98 and modified on 7-22-98 and on 3-3-05.
2. Emissions from cleanup of equipment associated with this emissions unit shall be attributed to (P047) Cleanup of equipment used for fiberglass reinforced composite plastics manufacture.
3. Baghouse (American Air Filter baghouse) also controls the particulate emissions from the following emissions units: P045, P046 and P047.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(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 - (P029) - SMC paste/wet mix mixer no. 3 with a baghouse (Co. ID. American Air Filter baghouse) to control particulate emissions - administrative modification of PTI 02-11578, issued on 4-8-98 and modified on 7-22-98 and on 3-3-05

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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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 -(P047) - Cleanup of equipment used for fiberglass reinforced composite plastics manufacture: wipe cleaning and two, lidded tanks

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
rule 3745-31-05(A)(3)	<p>Organic compound (OC) emissions shall not exceed 10,476 lbs/month and 62.8 tpy.</p> <p>Upon startup, the requirements of this rule also include the requirements of 40 CFR Parts 63.5780 through 63.5935.</p> <p>See section A.II.1.</p>
rule 3745-21-07(G)(2)	<p>This emissions unit is exempt from the requirements of OAC rule 3745-21-07(G)(2).</p> <p>See sections A.I.2.a, A.II.1 and A.II.2.</p>
40 CFR Part 63, Subpart WWWW	See sections A.I.2.a, A.I.2.b and Part II, sections A.1 through A.9.

2. Additional Terms and Conditions

- 2.a In accordance with 40 CFR 63.5835 and Table 4 of 40 CFR Part 63, Subpart WWWW, the permittee shall comply with the work practice standard to not use cleaning solvents that contain hazardous air pollutant (HAP), except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
- 2.b In accordance with 40 CFR 63.5835 and Table 4 of 40 CFR Part 63, Subpart WWWW, the permittee shall comply with the work practice standard to keep containers that store HAP-containing materials closed or covered except during the addition or removal of

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materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

II. Operational Restrictions

1. The permittee shall not employ any cleanup materials which are photochemically reactive, as defined in OAC rule 3745-21-01(C)(5).
2. The requirement to not employ any cleanup materials which are photochemically reactive, as defined in OAC rule 3745-21-01(C)(5), shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the operational restriction and record keeping requirements included in sections A.II.1 and A.III.2.b shall be void.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the company identification of each cleanup material employed;
 - b. the volume of each cleanup material employed, in gallons; and
 - c. the OC emissions from cleanup, in lbs/month.
2. The permittee shall maintain the following information to document the composition of each material employed:
 - a. the OC content of each cleanup material, in lbs/gallon; and
 - b. confirmation that each cleanup material is not photochemically reactive.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, section A.III.2.b will be voided entirely.]
3. The permittee shall conduct a daily inspection of this emissions unit and maintain a log of these inspections. The log shall include the compliance status of each work practice standard identified in sections A.I.2.a and A.I.2.b and shall contain the following information:
 - a. whether the emissions unit was in operation;

- b. an identification of each HAP in each cleaning solvent employed. If any cleaning solvent contains styrene, the specific application shall also be documented; and
 - c. a documentation of any time containers that store HAP containing materials were not kept closed or covered except during the addition or removal of materials. The records shall indicate how long the containers were not properly closed or covered and any actions taken to prevent a reoccurrence.
4. The records specified in section A.III.3 shall also include information on the duration and cause of each deviation and the corrective action taken. These records shall be maintained as specified in Part II.
 5. Modeling the federally regulated pollutant, styrene, a HAP, from the production operations to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03(F)(4)(b) is not necessary upon permittee certification of compliance with 40 CFR Part 63, Subpart WWWW.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information: an identification of each month during which the OC emissions exceeded 10,476 pounds per month, and the actual monthly OC emissions for each such month. These quarterly deviation (excursion) reports shall be submitted in accordance with Part I, the General Terms and Conditions of this permit.
2. The permittee shall submit semiannual reports, regarding the compliance status of each work practice standard identified in sections A.I.2.a and A.I.2.b and other general reporting and notification requirements within 40 CFR Part 63, Subpart WWWW, as specified in Part II.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

OC emissions shall not exceed 10,476 lbs/month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following equation:

$$E = V \times OC$$

where:

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E = OC emissions, lbs/month;

V = volume of cleanup solvent employed, in gal/month, as required in the record keeping requirements specified in section A.III.1; and

OC = OC content of the cleanup solvent employed, in lbs/gallon, as required in the record keeping requirements specified in section A.III.2.

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b. Emission Limitation:

OC emissions shall not exceed 62.8 tpy.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the summation of the monthly OC emission rates, as required in section A.III.1 for the calendar year, divided by 2,000 lbs/ton.

2. Any analysis of a material shall be based on the material as employed. 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).
3. In accordance with 40 CFR 63.5860(a) and Table 9 of 40 CFR Part 63, Subpart WWWW, the permittee must demonstrate initial compliance with the work practice standard(s), specified in sections A.I.2.a and A.I.2.b. Initial compliance has been demonstrated if the permittee submits a certified statement in the notice of compliance status that includes the following statements:
 - a. cleaning solvents that contain hazardous air pollutant (HAP) are not used, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment; and
 - b. containers that store HAP-containing materials are kept closed or covered, except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

VI. Miscellaneous Requirements

1. The work stations and/or operations that are included in emissions unit P047 may include the following but are not limited to: cleanup material storage; SMC machine (P007), mix vessel ("pot") cleaning and mixer blade cleaning associated with SMC paste/wet mix mixers (P029, P043, P044, P045); press line pump stands for distribution of resin paste to mold presses; two, lidded tanks; and waste cleanup material storage.

MFG Composite Systems Company
DTI Application: 02 22745

Facility ID: 0204010230

Emissions Unit ID: P047

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 - (P047) - Cleanup of equipment used for fiberglass reinforced composite plastics manufacture: wipe cleaning and two, lidded tanks

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None