



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 02-22983

Fac ID: 0204010230

DATE: 5/22/2008

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 of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 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: 5/22/2008
Effective Date: 5/22/2008

FINAL PERMIT TO INSTALL 02-22983

Application Number: 02-22983
Facility ID: 0204010230
Permit Fee: **\$400**
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):
4 presses.

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

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

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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 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.

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.

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- 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 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

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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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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 this permit.

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

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of any transfer of this permit.

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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 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

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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., postmarked), 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>
Styrene/VOC	29.61

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (P048) - 500 ton compression molding press no. 240

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)	See A.I.2.a below.
40 CFR 63, Subpart WWWW	See II.1 and II.2 below.

2. Additional Terms and Conditions

- 2.a Organic compound (VOC) and Hazardous Air Pollutant (HAP) emissions shall not exceed 2.60 pounds per hour and 11.39 tons per year. This limitation is based upon the maximum available styrene percent of 26, and the maximum mold compound usage rate of 1000 pounds per hour.

II. Operational Restrictions

1. The permittee must uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds per one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.
2. The permittee shall keep containers that store HAP-containing materials 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. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification for each mold compound employed;

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- b. the hours of operation of this unit;

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- c. the number of pounds of each mold compound employed;
 - d. the percent, by weight, of VOC/HAP in each mold compound employed.; and
 - e. the average hourly VOC/HAP emissions, calculated according to section V.1.a.
2. The permittee shall conduct daily inspections of this emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in section II.1 and II.2 and shall include the following information:
 - a. whether the emissions unit was in operation;
 - b. whether the permittee uncovered, unwrapped or exposed more than one charge per mold cycle per compression/injection molding machine as specified in section II.1;
 - c. whether any HAP containing materials were uncovered or vented; and
 - d. information on the duration and cause of each deviation and the corrective action taken.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day the average hourly VOC/HAP emissions exceeds 2.60 pounds per hour, and the actual daily VOC/HAP emissions for each such day.

If no deviations occurred during any such calendar quarter, a report indicating no deviations shall be sent.
2. The permittee shall submit semi-annual deviation(excursion) reports that identify:
 - a. any day the permittee uncovered, unwrapped or exposed more than one charge per mold cycle per compression/injection molding machine; and
 - b. any day that any HAP-containing storage containers are not closed or covered, except when adding or removing materials and that any bulk storage tanks are vented only as necessary for safety.
3. The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

V. Testing Requirements

1. Compliance with the allowable emission limitations in section A.1 of these terms and

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conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:
VOC/HAP emissions shall not exceed 2.60 pounds per hour.

Applicable Compliance Method:
Compliance shall be calculated as follows:

$\text{lbs VOC/HAP per day} = \text{sum for each mold compound employed } (\text{PWR}_d \times \text{VOC}_m \times 1.0\%)$

where:

PWR_d = the mass of each mold compound employed, in pounds per hour, recorded in III.1.d;

VOC_m = available VOC/HAP in each mold compound, as a percent, recorded in III.1.d; and

2.0 % = an emission factor based upon AP-24, Table 4.4-2 "Emission Factors for Uncontrolled Polyester Resin Product Fabrication Processes" (02/07).

- b. Emission Limitation:
VOC/HAP emissions shall not exceed 11.39 tons per year.

Applicable Compliance Method:
Compliance shall be calculated as follows:

$\text{tons VOC/HAP} = \text{sum for each mold compound employed } (\text{PWR}_{yr} \times \text{VOC}_m \times 1.0\%) / 2000 \text{ lbs/ton}$

where:

PWR_{yr} = the mass of each mold compound employed, in pounds per year, as a summation of the daily records in III.1.d;

VOC_m = available VOC/HAP in each mold compound, as a percent, recorded in III.1.d; and

2.0 % = an emission factor based upon AP-24, Table 4.4-2 "Emission Factors for Uncontrolled Polyester Resin Product Fabrication Processes" (02/07).

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

Emissions Unit ID: P048

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).

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VI. Miscellaneous Requirements

1. 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 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 - (P048) - 500 ton compression molding press no. 240

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

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping 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 -(P049) - 1000 tons compression molding press no. 241

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)	See A.I.2.a below.
40 CFR 63, Subpart WWWW	See II.1 and II.2 below.

2. Additional Terms and Conditions

- 2.a Organic compound (VOC) and Hazardous Air Pollutant (HAP) emissions shall not exceed 4.16 pounds per hour and 18.22 tons per year. This limitation is based upon the maximum available styrene percent of 26, and the maximum mold compound usage rate of 1000 pounds per hour.

II. Operational Restrictions

1. The permittee must uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds per one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.
2. The permittee shall keep containers that store HAP-containing materials 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. Monitoring and/or Recordkeeping Requirements

Emissions Unit ID: P049

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification for each mold compound employed;
 - b. the hours of operation of this unit;
 - c. the number of pounds of each mold compound employed;
 - d. the percent, by weight, of VOC/HAP in each mold compound employed.; and
 - e. the average hourly VOC/HAP emissions, calculated according to section V.1.a.
2. The permittee shall conduct daily inspections of this emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in section II.1 and II.2 and shall include the following information:
 - a. whether the emissions unit was in operation;
 - b. whether the permittee uncovered, unwrapped or exposed more than one charge per mold cycle per compression/injection molding machine as specified in section II.1;
 - c. whether any HAP containing materials were uncovered or vented; and
 - d. information on the duration and cause of each deviation and the corrective action taken.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day the average hourly VOC/HAP emissions exceeds 4.61 pounds per hour, and the actual daily VOC/HAP emissions for each such day.

If no deviations occurred during any such calendar quarter, a report indicating no deviations shall be sent.
2. The permittee shall submit semi-annual deviation(excursion) reports that identify:
 - a. any day the permittee uncovered, unwrapped or exposed more than one charge per mold cycle per compression/injection molding machine; and
 - b. any day that any HAP-containing storage containers are not closed or covered, except when adding or removing materials and that any bulk storage tanks are vented only as necessary for safety.
3. The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

V. Testing Requirements

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

- a. Emission Limitation:
VOC/HAP emissions shall not exceed 4.16 pounds per hour.

Applicable Compliance Method:
Compliance shall be calculated as follows:

$\text{lbs VOC/HAP per day} = \text{sum for each mold compound employed (PWR}_d \times \text{VOC}_m \times 1.0\%)$

where:

PWR = the mass of each mold compound employed, in pounds per hour, recorded in III.1.d;

VOC_m = available VOC/HAP in each mold compound, as a percent, recorded in III.1.d; and

2.0 % = an emission factor based upon AP-24, Table 4.4-2 "Emission Factors for Uncontrolled Polyester Resin Product Fabrication Processes" (02/07).

- b. Emission Limitation:
VOC/HAP emissions shall not exceed 18.22 tons per year.

Applicable Compliance Method:
Compliance shall be calculated as follows:

$\text{tons VOC/HAP} = \text{sum for each mold compound employed (PWR}_{yr} \times \text{VOC}_m \times 1.0\%) / 2000 \text{ lbs/ton}$

where:

PWR_{yr} = the mass of each mold compound employed, in pounds per year, as a summation of the daily records in III.1.d;

VOC_m = available VOC/HAP in each mold compound, as a percent, recorded in III.1.d; and

2.0 % = an emission factor based upon AP-24, Table 4.4-2 "Emission Factors for Uncontrolled Polyester Resin Product Fabrication Processes" (02/07).

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

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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).

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VI. Miscellaneous Requirements

1. 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 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 -(P049) - 1000 tons compression molding press no. 241

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

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None