



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov. Center

Application No: 02-12229

DATE: 12/18/2001

Venture Holdings Corporation
Roland Himes
333 Gore Rd
Conneaut, OH 44030

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

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA
William Jones USEPA, Region V

NEDO



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

FINAL PERMIT TO INSTALL 02-12229

Application Number: 02-12229
APS Premise Number: 0204020245
Permit Fee: **\$3600**
Name of Facility: Venture Holdings Corporation
Person to Contact: Roland Himes
Address: 333 Gore Rd
Conneaut, OH 44030

Location of proposed air contaminant source(s) [emissions unit(s)]:

333 Gore Rd
Conneaut, Ohio

Description of proposed emissions unit(s):

17 compression mold presses for fiberglass reinforced plastic parts & Jaygo mixer for sheet mold compound production.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.10 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

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

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are

required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) 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.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Permit Transfers

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

4. 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.

5. Termination of Permit To Install

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

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

6. Construction of New Sources(s)

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

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

7. 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.

8. 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).

9. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) 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.

10. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	55.16
PE	1.75

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

1. PROPOSED MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (MACT) STANDARDS

Within 120 days after promulgation of the National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report:

- a. the name and mailing address of the permittee;
 - b. the physical location of the source if it is different from the mailing address;
 - c. identification of the relevant MACT standard and the permittee's compliance date;
 - d. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and
 - e. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.
2. Within 60 days following completion of the required compliance demonstration activity specified in the 40 CFR 63, the permittee shall submit a notification of compliance status that contains the following information:
- a. the methods used to determine compliance;
 - b. the results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
 - c. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;
 - d. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR Part 63;
 - e. an analysis demonstrating whether the affected source is a major source or an area source;
 - f. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and

- g. a statement of whether or not the permittee has complied with the requirements of 40 CFR 63.

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

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #1 for fiberglass reinforced plastic parts	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 6.56 lbs/day and 1.20 TPY. OC emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.I.2.a and A.I.2.b.

2. Additional Terms and Conditions

- 2.a The emission limits based on this applicable rule are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic material consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.

- b. The total OC emission rate for all mold compounds employed, in pounds per day.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the OC emissions from the mold compounds exceeded 6.56 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A. I. 1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation: 6.56 lbs OC/day.

Applicable Compliance Method: Compliance may be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds:

$E = \text{summation of } (W_i \times EF_{oc}) \text{ for all mold compounds.}$

Where the following applies:

$E = \text{total, daily, OC emissions, in pounds per day.}$

$W_i = \text{the weight of mold compound "i" employed, in pounds per day.}$

$EF_{oc} = \text{the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene emissions during the Charging and Molding Cycle".}$

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Ventur

PTI A₁

Issued: 12/18/2001

Emissions Unit ID: **[P005]**

If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate.

- b. Emission Limitation: 1.20 TPY OC.

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A. III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 pounds/ton.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #1 for fiberglass reinforced plastic parts		Compliance with the Air Toxic Policy as specified in sections B.III.1 to B.III.4.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

2. Air Toxic Policy Clarifying Language

The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) (µg/m³)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration (µg/m³)	Maximum Acceptable Ground Level Concentration (MAGLC), (µg/m³)
P005-P009, P013, P014, P016- P024	Styrene	85,000	13.61	794	
P025	Styrene	85,000	1.49	1066	
Combination of all styrene emissions	Styrene			1860	2024

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

A.

State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #2 for fiberglass reinforced plastic parts	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 6.56 lbs/day and 1.20 TPY. OC emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.I.2.a and A.I.2.b.

2. Additional Terms and Conditions

- 2.a The emission limits based on this applicable rule are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic material consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.
 - b. The total OC emission rate for all mold compounds employed, in pounds per day.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the OC emissions from the mold compounds exceeded 6.56 pounds per day, and the actual OC emissions for each such day.

- 2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

- 1. Compliance with the emissions limitation(s) in section A. I. 1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation: 6.56 lbs OC/day

Applicable Compliance Method: Compliance may be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. Determination of total, daily organic compound emissions for all mold compounds:

$$E = \text{summation of } (W_i \times E_{foc}) \text{ for all mold compounds.}$$

Where the following applies:

$$E = \text{total, daily, organic compound emissions, in pounds per day.}$$

$$W_i = \text{the weight of mold compound "i" employed, in pounds per day.}$$

$$E_{foc} = \text{the organic compound emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene emissions during the Charging and Molding Cycle".}$$

If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate.

- b. Emission Limitation: 1.20 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A. III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 pounds/ton.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #2 for fiberglass reinforced plastic parts		Compliance with the Air Toxic Policy as specified in sections B.III.1. to B.III.4.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Emissions Unit ID: [P006]

2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$)	Maximum Acceptable Ground Level Concentration (MAGLC), ($\mu\text{g}/\text{m}^3$)
P005-P009, P013, P014 & P016- P024	Styrene	85,000	13.61	794	
P025	Styrene	85,000	1.49	1066	
Combination of all styrene emissions	Styrene			1860	2024

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the

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Emissions Unit ID: **[P006]**

Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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Emissions Unit ID: [P006]

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #3 for fiberglass reinforced plastic parts	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 3.47 lbs/day and 0.63 TPY. OC emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.I.2.a and A.I.2.b.

2. Additional Terms and Conditions

- 2.a The emission limits based on this applicable rule are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic material consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.
 - b. The total OC emission rate for all mold compounds employed, in pounds per day.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the OC emissions from the mold compounds exceeded 3.47 pounds per day, and the actual OC emissions for each such day.

2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A. I. 1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation: 3.47 lbs OC/day.

Applicable Compliance Method: Compliance may be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds:

$E =$ summation of $(W_i \times E_{foc})$ for all mold compounds.

Where the following applies:

$E =$ total, daily, OC emissions, in pounds per day.

$W_i =$ the weight of mold compound "i" employed, in pounds per day.

$E_{foc} =$ the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene emissions during the Charging and Molding Cycle".

If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate.

- b. Emission Limitation: 0.63 TPY OC.

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A. III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 pounds/ton.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #3 for fiberglass reinforced plastic parts		Compliance with the Air Toxic Policy as specified in sections B.III.1. to B.III.4.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Emissions Unit ID: [P007]

2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) (µg/m ³)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration (µg/m ³)	Maximum Acceptable Ground Level Concentration (MAGLC), (µg/m ³)
P005-P009, P013, P014 & P016- P024	Styrene	85,000	13.61	794	
P025	Styrene	85,000	1.49	1066	
Combination of all styrene emissions	Styrene			1860	2024

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the

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Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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Emissions Unit ID: **[P007]**

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #4 for fiberglass reinforced plastic parts	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 6.75 lbs/day and 1.23 TPY. OC emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.I.2.a and A.I.2.b.

2. Additional Terms and Conditions

- 2.a The emission limits based on this applicable rule are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic material consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.

Emissions Unit ID: [P008]

- b. The total OC emission rate for all mold compounds employed, in pounds per day.

IV. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the OC emissions from the mold compounds exceeded 6.75 pounds per day, and the actual OC emissions for each such day.
- 2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

- 1. Compliance with the emissions limitation(s) in section A. I. 1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation: 6.75 lbs OC/day

Applicable Compliance Method: Compliance may be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds:

$E = \text{summation of } (W_i \times E_{foc}) \text{ for all mold compounds.}$

Where the following applies:

$E = \text{total, daily, OC emissions, in pounds per day.}$

$W_i = \text{the weight of mold compound "i" employed, in pounds per day.}$

$E_{foc} = \text{the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene emissions during the Charging and Molding Cycle".}$

If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate.

- b. Emission Limitation: 1.23 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A. III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #4 for fiberglass reinforced plastic parts		Compliance with the Air Toxic Policy as specified in sections B.III.1. to B.III.4.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Emissions Unit ID: [P008]

2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$)	Maximum Acceptable Ground Level Concentration (MAGLC), ($\mu\text{g}/\text{m}^3$)
P005-P009, P013, P014 & P016- P024	Styrene	85,000	13.61	794	
P025	Styrene	85,000	0.69	1066	
Combination of all styrene emissions	Styrene			1860	2024

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the

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Emissions Unit ID: **[P008]**

Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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Emissions Unit ID: [P008]

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #5 for fiberglass reinforced plastic parts	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 0.48 lb/hr, 11.6 lbs/day and 2.11 TPY. OC emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.I.2.a and A.I.2.b.

2. Additional Terms and Conditions

- 2.a The emission limits based on this applicable rule are less stringent than the limits pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic material consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.

- b. The total OC emission rate for all mold compounds employed, in pounds per day.
- c. The total number of hours the emissions unit was in operation.
- e. The average hourly OC emission rate for all mold compounds employed, i.e., b/c, in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the mold compound exceeded 0.48 pound per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the OC emissions from the mold compounds exceeded 11.6 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A. I. 1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation: 0.48 lb OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate.

- b. Emission Limitation: 11.6 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds:

$E = \text{summation of } (W_i \times EF_{oc}) \text{ for all mold compounds.}$

Where the following applies:

$E = \text{total, daily, OC emissions, in pounds per day.}$

$W_i = \text{the weight of mold compound "i" employed, in pounds per day.}$

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E_{foc} = the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene emissions during the Charging and Molding Cycle".

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Emissions Unit ID: **[P009]**

- c. Emission Limitation: 2.11 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A. III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #5 for fiberglass reinforced plastic parts		Compliance with the Air Toxic Policy as specified in sections B.III.1. to B.III.4.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Emissions Unit ID: [P009]

2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$)	Maximum Acceptable Ground Level Concentration (MAGLC), ($\mu\text{g}/\text{m}^3$)
P005-P009, P013, P014 & P016- P024	Styrene	85,000	13.61	794	
P025	Styrene	85,000	0.69	1066	
Combination of all styrene emissions	Styrene			1860	2024

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the

Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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Emissions Unit ID: **[P009]**

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #9 for fiberglass reinforced plastic parts	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 3.47 lbs/day and 0.63 TPY. OC emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.I.2.a and A.I.2.b.

2. Additional Terms and Conditions

- 2.a The emissions limit based on this applicable rule are less stringent than the limits pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic material consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the molding operation(s):
 - a. The number of pounds of all mold compounds employed.
 - b. The total OC emission rate for all mold compounds employed, in pounds per day.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the OC emissions from the mold compounds exceeded 3.47 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A. I. 1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation: 3.47 lbs OC/day

Applicable Compliance Method: Compliance may be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds:

$E = \text{summation of } (W_i \times E_{foc}) \text{ for all mold compounds.}$

Where the following applies:

$E = \text{total, daily, OC emissions, in pounds per day.}$

$W_i = \text{the weight of mold compound "i" employed, in pounds per day.}$

$E_{foc} = \text{the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene emissions during the Charging and Molding Cycle".}$

If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate.

- b. Emission Limitation: 0.63 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A. III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #9 for fiberglass reinforced plastic parts		Compliance with the Air Toxic Policy as specified in sections B.III.1. to B.III.4.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Emissions Unit ID: [P013]

2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$)	Maximum Acceptable Ground Level Concentration (MAGLC), ($\mu\text{g}/\text{m}^3$)
P005-P009, P013, P014 & P016- P024	Styrene	85,000	13.61	794	
P025	Styrene	85,000	1.49	1066	
Combination of all styrene emissions	Styrene			1860	2024

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the

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Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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Emissions Unit ID: **[P013]**

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

A.
State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #10 for fiberglass reinforced plastic parts	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 0.52 lb/hr, 12.5 lbs/day and 2.29 TPY. OC emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.I.2.a and A.I.2.b.

2. Additional Terms and Conditions

- 2.a The emission limits based on this applicable rule are less stringent than the limits pursuant to OAC rule 3745-31-03(A)(3).
- 2.b The emissions of organic material consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.

Emissions Unit ID: **[P014]**

- b. The total OC emission rate for all mold compounds employed, in pounds per day.
- c. The total number of hours the emissions unit was in operation.
- d. The average hourly OC emission rate for all mold compounds employed, i.e., b/c, in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the mold compound exceeded 0.52 pound per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the OC emissions from the mold compounds exceeded 12.5 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A. I. 1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation: 0.52 lb OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate.

- b. Emission Limitation: 12.5 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds:

$$E = \text{summation of } (W_i \times EF_{oc}) \text{ for all mold compounds.}$$

Where the following applies:

$$E = \text{total, daily, OC emissions, in pounds per day.}$$

$$W_i = \text{the weight of mold compound "i" employed, in pounds per day.}$$

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E_{foc} = the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene emissions during the Charging and Molding Cycle".

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- c. Emission Limitation: 2.29 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A. III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #10 for fiberglass reinforced plastic parts		Compliance with the Air Toxic Policy as specified in sections B.III.1. to B.III.4.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Emissions Unit ID: [P014]

2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$)	Maximum Acceptable Ground Level Concentration (MAGLC), ($\mu\text{g}/\text{m}^3$)
P005-P009, P013, P014 & P016- P024	Styrene	85,000	13.61	794	
P025	Styrene	85,000	1.49	1066	
Combination of all styrene emissions	Styrene			1860	2024

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the

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Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #12 for fiberglass reinforced plastic parts	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 0.43 lb/hr, 10.4 lbs/day and 1.90 TPY. OC emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.I.2.a and A.I.2.b.

2. Additional Terms and Conditions

- 2.a The emission limits based on this applicable rule are less stringent than the limits pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic material consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
- a. The number of pounds of all mold compounds employed.

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- b. The total OC emission rate for all mold compounds employed, in pounds per day.
- c. The total number of hours the emissions unit was in operation.
- e. The average hourly OC emission rate for all mold compounds employed, i.e., b/c, in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the mold compound exceeded 0.43 pound per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the OC emissions from the mold compounds exceeded 10.4 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A. I. 1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation: 0.43 lb OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate.

- b. Emission Limitation: 10.4 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds:

$E = \text{summation of } (W_i \times EF_{oc}) \text{ for all mold compounds.}$

Where the following applies:

$E = \text{total, daily, OC emissions, in pounds per day.}$

$W_i = \text{the weight of mold compound "i" employed, in pounds per day.}$

E_{foc} = the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene emissions during the Charging and Molding Cycle".

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- c. Emission Limitation: 1.90 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A. III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #12 for fiberglass reinforced plastic parts		Compliance with the Air Toxic Policy as specified in sections B.III.1. to B.III.4.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Emissions Unit ID: [P016]

2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$)	Maximum Acceptable Ground Level Concentration (MAGLC), ($\mu\text{g}/\text{m}^3$)
P005-P009, P013, P014 & P016- P024	Styrene	85,000	13.61	794	
P025	Styrene	85,000	0.69	1066	
Combination of all styrene emissions	Styrene			1860	2024

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the

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Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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Emissions Unit ID: **[P016]**

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #13 for fiberglass reinforced plastic parts	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 6.75 lbs/day and 1.23 TPY. OC emissions 8 lbs/hr and 40 lbs/day. See A.I.2.a and A.I.2.b.

2. Additional Terms and Conditions

- 2.a The emission limits based on this applicable rule are less stringent than the limits pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic material consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.
 - b. The total OC emission rate for all mold compounds employed, in pounds per day.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the OC emissions from the mold compounds exceeded 6.75 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A. I. 1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation: 6.75 lbs OC/day

Applicable Compliance Method: Compliance may be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds:

$E = \text{summation of } (W_i \times E_{foc}) \text{ for all mold compounds.}$

Where the following applies:

$E = \text{total, daily, OC emissions, in pounds per day.}$

$W_i = \text{the weight of mold compound "i" employed, in pounds per day.}$

$E_{foc} = \text{the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene emissions during the Charging and Molding Cycle".}$

If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate.

- b. Emission Limitation: 1.23 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A. III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #13 for fiberglass reinforced plastic parts		Compliance with the Air Toxic Policy as specified in sections B.III.1. to B.III.4.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Emissions Unit ID: [P017]

2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$)	Maximum Acceptable Ground Level Concentration (MAGLC), ($\mu\text{g}/\text{m}^3$)
P005-P009, P013, P014 & P016- P024	Styrene	85,000	13.61	794	
P025	Styrene	85,000	1.49	1066	
Combination of all styrene emissions	Styrene			1860	2024

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the

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Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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Emissions Unit ID: **[P017]**

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

**A.
 State and Federally Enforceable Section**

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #14 for fiberglass reinforced plastic parts	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 0.80 lb/hr, 19.3 lbs/day and 3.52 TPY. OC emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.I.2.a and A.I.2.b.

2. Additional Terms and Conditions

- 2.a The emission limits based on this applicable rule are less stringent than the limits pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic material consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.

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- b. The total OC emission rate for all mold compounds employed, in pounds per day.
- c. The total number of hours the emissions unit was in operation.
- d. The average hourly OC emission rate for all mold compounds employed, i.e., b/c, in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the mold compound exceeded 0.80 pound per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the OC emissions from the mold compounds exceeded 19.3 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A. I. 1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation: 0.80 lb OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate.

- b. Emission Limitation: 19.3 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds:

$E = \text{summation of } (W_i \times EF_{oc}) \text{ for all mold compounds.}$

Where the following applies:

$E = \text{total, daily, OC emissions, in pounds per day.}$

$W_i = \text{the weight of mold compound "i" employed, in pounds per day.}$

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E_{foc} = the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene emissions during the Charging and Molding Cycle".

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- c. Emission Limitation: 3.52 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A. III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #14 for fiberglass reinforced plastic parts		Compliance with the Air Toxic Policy as specified in sections B.III.1. to B.III.4.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Emissions Unit ID: [P018]

2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$)	Maximum Acceptable Ground Level Concentration (MAGLC), ($\mu\text{g}/\text{m}^3$)
P005-P009, P013, P014 & P016- P024	Styrene	85,000	13.61	794	
P025	Styrene	85,000	1.49	1066	
Combination of all styrene emissions	Styrene			1860	2024

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the

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Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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Emissions Unit ID: **[P018]**

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #15 for fiberglass reinforced plastic parts	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 0.80 lb/hr, 19.3 lbs/day and 3.52 TPY. OC emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.I.2.a and A.I.2.b.

2. Additional Terms and Conditions

- 2.a The emission limits based on this applicable rule are less stringent than the limits pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic material consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
- a. The number of pounds of all mold compounds employed.

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- b. The total OC emission rate for all mold compounds employed, in pounds per day.
- c. The total number of hours the emissions unit was in operation.
- d. The average hourly OC emission rate for all mold compounds employed, i.e., b/c, in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the mold compound exceeded 0.80 pound per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the OC emissions from the mold compounds exceeded 19.3 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A. I. 1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation: 0.80 lb OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate.

- b. Emission Limitation: 19.3 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds:

$E = \text{summation of } (W_i \times EF_{oc}) \text{ for all mold compounds.}$

Where the following applies:

$E = \text{total, daily, OC emissions, in pounds per day.}$

$W_i = \text{the weight of mold compound "i" employed, in pounds per day.}$

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Emissions Unit ID: **[P019]**

E_{foc} = the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene emissions during the Charging and Molding Cycle".

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- c. Emission Limitation: 3.52 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A. III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #15 for fiberglass reinforced plastic parts		Compliance with the Air Toxic Policy as specified in sections B.III.1. to B.III.4.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Emissions Unit ID: [P019]

2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) (µg/m ³)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration (µg/m ³)	Maximum Acceptable Ground Level Concentration (MAGLC), (µg/m ³)
P005-P009, P013, P014 & P016- P024	Styrene	85,000	13.61	794	
P025	Styrene	85,000	1.49	1066	
Combination of all styrene emissions	Styrene			1860	2024

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the

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Emissions Unit ID: **[P019]**

Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

A

. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #16 for fiberglass reinforced plastic parts	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 0.64 lb/hr, 15.4 lbs/day and 2.82 TPY. OC emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.I.2.a and A.I.2.b.

2. Additional Terms and Conditions

- 2.a The emission limits based on this applicable rule are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic material consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of pounds of all mold compounds employed.

- b. The total OC emission rate for all mold compounds employed, in pounds per day.
- c. The total number of hours the emissions unit was in operation.
- d. The average hourly, OC emission rate for all mold compounds employed, i.e., b/c, in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the mold compound exceeded 0.64 pound per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the OC emissions from the mold compounds exceeded 15.4 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A. I. 1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation: 0.64 lb OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate.

- b. Emission Limitation: 15.4 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds:

$$E = \text{summation of } (W_i \times EF_{oc}) \text{ for all mold compounds.}$$

Where the following applies:

$$E = \text{total, daily, OC emissions, in pounds per day.}$$

$$W_i = \text{the weight of mold compound "i" employed, in pounds per day.}$$

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Emissions Unit ID: **[P020]**

E_{foc} = the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene emissions during the Charging and Molding Cycle".

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Emissions Unit ID: **[P020]**

- c. Emission Limitation: 2.82 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A. III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #16 for fiberglass reinforced plastic parts		Compliance with the Air Toxic Policy as specified in sections B.III.1. to B.III.4.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Emissions Unit ID: [P020]

2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) (µg/m ³)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration (µg/m ³)	Maximum Acceptable Ground Level Concentration (MAGLC), (µg/m ³)
P005-P009, P013, P014 & P016- P024	Styrene	85,000	13.61	794	
P025	Styrene	85,000	1.49	1066	
Combination of all styrene emissions	Styrene			1860	2024

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the

Emissions Unit ID: **[P020]**

Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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Emissions Unit ID: **[P020]**

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

A.
State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #17 for fiberglass reinforced plastic parts	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 0.72 lb/hr, 17.4 lbs/day and 3.17 TPY. OC emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.I.2.a and A.I.2.b.

2. Additional Terms and Conditions

- 2.a The emission limits based on this applicable rule are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emissions of organic material consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
- a. The number of pounds of all mold compounds employed.

- b. The total OC emission rate for all mold compounds employed, in pounds per day.
- c. The total number of hours the emissions unit was in operation.
- d. The average hourly OC emission rate for all mold compounds employed, i.e., b/c, in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the mold compound exceeded 0.72 pound per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the OC emissions from the mold compounds exceeded 17.4 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A. I. 1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation: 0.72 lb OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate.

- b. Emission Limitation: 17.4 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds:

$$E = \text{summation of } (W_i \times E_{Foc}) \text{ for all mold compounds.}$$

Where the following applies:

$$E = \text{total, daily, OC emissions, in pounds per day.}$$

$$W_i = \text{the weight of mold compound "i" employed, in pounds per day.}$$

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Emissions Unit ID: **[P021]**

E_{foc} = the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene emissions during the Charging and Molding Cycle".

- c. Emission Limitation: 3.17 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A. III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #17 for fiberglass reinforced plastic parts		Compliance with the Air Toxic Policy as specified in sections B.III.1. to B.III.4.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$)	Maximum Acceptable Ground Level Concentration (MAGLC), ($\mu\text{g}/\text{m}^3$)
P005-P009, P013, P014 & P016- P024	Styrene	85,000	13.61	794	
P025	Styrene	85,000	1.49	1066	
Combination of all styrene emissions	Styrene			1860	2024

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the

application and modeled; and

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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Facility ID: **0204020245**

Emissions Unit ID: **[P021]**

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

A.
State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #18 for fiberglass reinforced plastic parts	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.80 lb/hr, 19.3 lbs/day and 3.52 TPY.
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.I.2.a and A.I.2.b.

2. Additional Terms and Conditions

- 2.a The emission limits based on this applicable rule are less stringent than the limits established pursuant to OAC rule 375-31-05(A)(3).
- 2.b The emissions of organic material consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
- a. The number of pounds of all mold compounds employed.

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- b. The total OC emission rate for all mold compounds employed, in pounds per day.
- c. The total number of hours the emissions unit was in operation.
- d. The average hourly OC emission rate for all mold compounds employed, i.e., b/c, in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the mold compound exceeded 0.80 pound per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the OC emissions from the mold compounds exceeded 19.3 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A. I. 1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation: 0.80 lb OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate.

- b. Emission Limitation: 19.3 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds:

$E = \text{summation of } (W_i \times EF_{oc}) \text{ for all mold compounds.}$

Where the following applies:

$E = \text{total, daily, OC emissions, in pounds per day.}$

$W_i = \text{the weight of mold compound "i" employed, in pounds per day.}$

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Efoc = the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene emissions during the Charging and Molding Cycle".

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- c. Emission Limitation: 3.52 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A. III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #18 for fiberglass reinforced plastic parts		Compliance with the Air Toxic Policy

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$)	Maximum Acceptable Ground Level Concentration (MAGLC), ($\mu\text{g}/\text{m}^3$)
P005-P009, P013, P014 & P016- P024	Styrene	85,000	13.61	794	
P025	Styrene	85,000	1.49	1066	
Combination of all styrene emissions	Styrene			1860	2024

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the

application and modeled; and

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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Emissions Unit ID: **[P022]**

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

**A
 . State and Federally Enforceable Section**

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #19 for fiberglass reinforced plastic parts	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.77 lbs/hr and 7.75 TPY.
	OAC rule 3745-21-07(G)(2)	See A.I.2.a. and A.I.2.b.
	OAC rule 3745-21-07(G)(9)(g)	OC emissions shall not exceed 42.5 pounds per day. See A.I.2.c. and A.I.2.d.

2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the OC emission limitations specified in OAC rule 3745-21-07(G)(2) since it meets the requirements specified in OAC rule 3745-21-07(G)(9)(g).
- 2.b The hourly emission limit based on this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The emissions of organic material consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
- 2.d Only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding machine.

II. Operational Restrictions

1. The volatile organic compound (VOC) content of each mold compound shall be no more than 17% (by weight), as applied.
2. The use of cleanup solvents, containing OC materials, is prohibited.

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Emissions Unit ID: **[P023]**

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each mold compound employed.
 - b. The number of pounds of each mold compound employed.
 - c. The VOC content of each mold compound as applied, in percent by weight.
 - d. The total OC emission rate for all mold compounds employed, in pounds per day.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly OC emission rate for all mold compounds employed, i.e., d/e, in pounds per hour (average).
2. For each day during which the permittee employs a cleanup solvent, containing OC materials, the permittee shall maintain a record of the following information:
 - a. The company identification of the cleanup solvent employed.
 - b. Whether or not each cleanup solvent contains any OC, and if so the OC content, in percent by weight, of the cleanup solvent employed and the number of pounds of each cleanup solvent employed.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the mold compound exceeded 1.77 lbs/hr, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the OC emissions from the mold compounds exceeded 42.5 lbs/day, and the actual OC emissions for each such day.
 - c. An identification of each day during which cleanup solvents, containing OC materials,

were employed.

d. An identification of each day during which the VOC content of any mold compound exceeded 17% (by weight), was employed.

2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A. I. 1. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation: 1.77 lbs OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. 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 1-4 and Method 18, 25 or 25A, as appropriate.

b. Emission Limitation: 42.5 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds:

$E =$ summation of $(W_i \times EF_{oc})$ for all mold compounds.

Where the following applies:

$E =$ total, daily, OC emissions, in pounds per day.

$W_i =$ the weight of mold compound "i" employed, in pounds per day.

$EF_{oc} =$ the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene Emissions During the Charging and Molding Cycle".

c. Emission Limitation: 7.75 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A. III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 lbs/ton.

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2. Any determination of volatile organic compound (VOC) content, (percent by weight), solids content, or density of a mold compound shall be based on the mold compound as employed, including the addition of any monomer to the mold compound. The permittee shall determine the VOC content of the mold compound by formulation data supplied by the manufacturer or from data determined by an analysis of each mold compound, as employed, by USEPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA or USEPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA and USEPA) performed on the mold compound(s).

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #19 for fiberglass reinforced plastic parts		Compliance with the Air Toxic Policy as specified in sections B.III.1. to B.III.4.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Emissions Unit ID: [P023]

2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$)	Maximum Acceptable Ground Level Concentration (MAGLC), ($\mu\text{g}/\text{m}^3$)
P005-P009, P013, P014 & P016- P024	Styrene	85,000	13.61	794	
P025	Styrene	85,000	1.49	1066	
Combination of all styrene emissions	Styrene			1860	2024

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the

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Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #20 for fiberglass reinforced plastic parts	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-07(G)(2) OAC rule 3745-21-07(G)(9)(g)	Organic compound (OC) emissions shall not exceed 2.72 lbs/hr and 11.90 TPY. See A.I.2.a. and A.I.2.b. OC emissions shall not exceed 65.2 lbs/day. See A.I.2.c. and A.I.2.d.

2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the OC emission limitations specified in OAC rule 3745-21-07(G)(2) since it meets the requirements specified in OAC rule 3745-21-07(G)(9)(g).
- 2.b The hourly emission limit based on the applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The emissions of organic material consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(B)(5).
- 2.d Only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding machine.

II. Operational Restrictions

1. The volatile organic compound (VOC) content of each mold compound shall be no more than

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Emissions Unit ID: **[P024]**

17% (by weight), as applied.

2. The use of cleanup solvents, containing OC materials, is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each mold compound employed.
 - b. The number of pounds of each mold compound employed.
 - c. The VOC content of each mold compound, as applied, in percent by weight.
 - d. The total OC emission rate for all mold compounds employed, in pounds per day.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly OC emission rate for all mold compounds employed, i.e., d/e, in pounds per hour (average).
2. For each day during which the permittee employs a cleanup solvent, containing OC materials, the permittee shall maintain a record of the following information:
 - a. The company identification of the cleanup solvent employed.
 - b. Whether or not each cleanup solvent contains any OC, and if so the OC content, in percent by weight, of the cleanup solvent employed and the number of pounds of each cleanup solvent employed.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the mold compound exceeded 2.72 pounds per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the OC emissions from the mold compounds exceeded 65.2 pounds per day, and the actual OC emissions for each such day.

- c. An identification of each day during which cleanup solvents, containing OC materials, were employed.
 - d. An identification of each day during which a mold compound, with a styrene content greater than 17% (by weight), was employed.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A. I. 1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation: 2.72 lbs OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. 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 1-4 and Method 18, 25 or 25A, as appropriate.

- b. Emission Limitation: 65.2 lbs OC/day

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A. III.1. of these terms and conditions. Determination of total, daily OC emissions for all mold compounds:

$E = \text{summation of } (W_i \times E_{foc}) \text{ for all mold compounds.}$

Where the following applies:

$E = \text{total, daily, OC emissions, in pounds per day.}$

$W_i = \text{the weight of mold compound "i" employed, in pounds per day.}$

$E_{foc} = \text{the OC emission factor, which is 0.00134 pounds per pound of mold compound, as determined from a Society of Plastics Industry report, "Styrene emissions during the Charging and Molding Cycle".}$

- c. Emission Limitation: 11.90 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A.III.1. of these terms and conditions and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 pounds/ton.

2. Any determination of volatile organic compound (VOC) content (percent by weight), solids content, or density of a mold compound shall be based on the mold compound as employed, including the addition of monomer to the mold compound. The permittee shall determine the VOC content of the mold compound, as employed, by USEPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA or USEPA may require the permittee to have a Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA and USEPA) performed on the mold compound(s).

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Compression molding press #20 for fiberglass reinforced plastic parts		Compliance with the Air Toxic Policy as specified in sections B.III.1. to B.III.4.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) (µg/m ³)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration (µg/m ³)	Maximum Acceptable Ground Level Concentration (MAGLC), (µg/m ³)
P005-P009, P013, P014 & P016- P024	Styrene	85,000	13.61	794	
P025	Styrene	85,000	1.49	1066	
Combination of all styrene emissions	Styrene			1860	2024

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in

an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A.

State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Jaygo mixer for polyester resin/styrene paste production with a baghouse (JAYCODC) to control dust	OAC rule 3745-31-05(A)(3)	Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average. Particulate emissions (PE) shall not exceed 0.40 lbs/hr and 1.75 TPY. Organic compound (OC) emissions shall not exceed 1.49 lbs/hr, 35.8 lbs/day and 6.53 tons/year.
	OAC rule 3745-17-07(A)	Visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 6-minute average, except as specified by rule. See A.I.2.a.
	OAC rule 3745-17-11(B)(1)	(PE) shall not exceed 6.52 lbs/hr. See A.I.2.a.
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.I.2.a. and A.I.2.b.

2. Additional Terms and Conditions

- 2.a The emission limit(s) based on this applicable rule is less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3).

- 2.b** The emissions of organic material consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

1. The pressure drop across the fabric filter shall be maintained within the range recommended by the manufacturer while the emissions unit is in operation.
2. The use of cleanup solvents containing OCs is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a once per eight (8) hour shift basis.
2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each mix manufactured.
 - b. The number of pounds of each mix manufactured.
 - c. The styrene content of each mix manufactured, in percent by weight each.
 - d. The total OC emission rate for all mixes manufactured, in pounds per day.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly OC emission rate for all mixes manufactured, i. e., d/e, in pounds per hour (average).
3. For each day during which the permittee employs a cleanup solvent, the permittee shall maintain a record of the following information:
 - a. The company identification of each cleanup solvent employed.
 - b. Whether or not each cleanup solvent contains any OC, and if so the OC content, in

percent by weight, of the cleanup solvent employed and the number of pounds of each cleanup solvent employed.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.1.
 - b. An identification of each day during which the average hourly OC emissions from the mixes exceeded 1.49 pounds per hour, and the actual average hourly OC emissions for each such day.
 - c. An identification of each day during which the OC emissions from the mixes exceeded 35.8 pounds per day, and the actual organic compound emissions for each such day.
 - d. An identification of each day during which cleanup solvents, containing OC materials, were employed.
3. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation: 5% opacity of visible particulate emissions

Applicable Compliance Method: Compliance shall be determined based upon OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation: 0.40 lb PE/hr

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

$$EH = P \times EF \times (1 - CE).$$

Where the following applies:

EH = PE, in pounds per hour.

P = maximum dry solids throughput rate, which is 4000 pounds per hour as noted in the permit application.

EF = emission factor for uncontrolled PE, which is 0.01 pounds of uncontrolled PE per pound of dry solids processed, as noted in AP-42 chapter 6.4 (5/83).

CE = control efficiency of PE control device(s), which is 99% as noted in the permit application.

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

- c. Emission Limitation: 1.75 TPY PE

Applicable Compliance Method: To determine the actual worst case rate for PE, the actual, hourly, worst case emission rate as determined in section A.V.1.b. shall be multiplied by 8760 hrs/yr and divided by 2000 lbs/ton.

- d. Emission Limitation: 1.49 lb OC/hr

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section A. III.2. of these terms and conditions.

- e. Emission Limitation: 35.8 lbs OC/day

Applicable Compliance Methods: Compliance shall be determined based upon the following:

$$E(\text{mix}) = [\text{summation of } (W_i \times SC_i)] \times EFs$$

Where the following applies:

E(mix) = total, daily, organic compound emissions from the mix operations, in pounds per day.

- Wi = the weight of mix "i" employed, in pounds per day.
- Sci = the styrene content of mix "i", in percent by weight.
- EFs = the styrene emission factor, in pounds of styrene emissions per pound of available styrene content, as determined from testing as required in section A.V.3.

f. Emission Limitation: 6.53 TPY OC

Applicable Compliance Method: Compliance shall be based on the record keeping specified in section A. III. 2. of this permit and shall be the sum of the daily OC emission rates for the calendar year divided by 2000 lbs/ton.

2. Any determination of organic compound content (percent by weight), solids content, or density of a material shall be based on the mold compound 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 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the 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. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 6 months after issuance of the permit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for organic compounds, in lbs/hr, and to develop a styrene emission factor, in pounds of styrene emissions per pound of available styrene content.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for organic compounds, Methods 1-4 and 25 of 40 CFR Part 60, Appendix A, or alternate test methods if approved by Ohio EPA.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
4. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test"

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notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Offices refusal to accept the results of the emission test(s).

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

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

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Jaygo mixer for polyester resin/styrene paste production with a baghouse (JAYCODC)		Compliance with the Air Toxic Policy as specified in sections B.III.1. to B.III.4.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model for most emissions units and the SCREEN3 model for P025. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) (µg/m ³)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration (µg/m ³)	Maximum Acceptable Ground Level Concentration (MAGLC), (µg/m ³)
P005-P009, P013, P014, P016-P024	Styrene	85,000	13.61	794	
P025	Styrene	85,000	1.49	1066	
Combination of all styrene emissions	Styrene			1860	2024

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the

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Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None