☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**
Permit To Install: 02-22050

A. Source Description -

Continental Structural Plastics of Ohio, LLC (CSP) makes reinforced plastic composite parts, also called fiberglass reinforced plastic (FRP) parts.

This application for PTI 02-22050 is for a Chapter 31 modification of PTI 02-18224 issued on September 23, 2004 for (P028) Mixer 1 for polyester resin/styrene paste production with a baghouse to control particulate emissions. The styrene content of the paste and the total materials throughput will be increased so that potential OC emissions will also increase. The dry, solids throughput will be unchanged so that the potential particulate emissions will remain the same. The usage and allowable emissions of cleanup/purge solvent will remain the same.

B. Facility Emissions and Attainment Status -

CSP is a Title V facility and is a major source for styrene, a hazardous air pollutant (HAP). The maximum (unrestricted) potential to emit is about 165 tons/yr of volatile organic compound (VOC) emissions, which is above the 100 tons/yr threshold. This facility is in Conneaut, Ohio in Ashtabula County, which is non-attainment for ozone as of June 14, 2004. A pending project, application for PTI 02-21602, to install five compression mold presses nos. 22-26 (P030-P034) will have a project allowable rate of 33.95 tons OC/yr, which are essentially VOCs. The facility-wide potential OC/VOC emissions will increase to 192.3 tons OC/VOC emissions with the pending addition of the mold presses.

C. Source Emissions -

Potential, VOC Emissions with restrictions on cleanup -
30.22 tons VOC_{PASTE}/yr + 6.79 tons $OC_{CLEANUP}$/yr = 30.22 tons VOC/yr.
Styrene emissions from the paste production are VOCs. Current PTI 02-18224 prohibits the use of VOC materials for cleanup/purge materials, such as methyl acetate, was cited as a state of Ohio BAT requirement, at the applicant's request to limit potential VOC emissions.

Potential, OC Emissions with no restrictions - 30.22 tons OC_{PASTE}/yr + 6.79 tons $OC_{CLEANUP}$/yr = 37.0 tons OC/yr.

An operational restriction of 1,892.75 tons styrene throughput per rolling, 12-month period was proposed. The restricted VOC emissions, as styrene, would be:
1,892.75 $tons_{STYRENE}$/yr x 2000 $lbs_{STYRENE}$/$tons_{STYRENE}$ x 0.00345 lb VOC/$lb_{STYRENE}$
x ton VOC/2000 lbs VOC = 6.53 TPY VOC.

Total, restricted OC emissions would be:
6.53 tons OC_{PASTE}/yr + 6.79 tons $OC_{CLEANUP}$/yr = 13.3 tons OC/yr.

D. Conclusion -

The applicant wishes to limit the potential emit so that the project will be a minor VOC addition of <40 TPY VOC to a major VOC source and therefore not subject to major source review. The applicant proposed a federally enforceable restriction of 1,892.75 tons styrene throughput, as a rolling 12-month limit from the paste production operations.

State of Ohio Environmental Protection Agency

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

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

Application No: 02-22050
Fac ID: 0204020245

DATE: 7/11/2006

Continental Structural Plastics of Ohio
David Murtha
333 Gore Rd
Conneaut, OH 43030

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$750** will be due. Please do not submit any payment now.

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

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **NEDO** **Eastgate Dev & Trans Study** **NY** **PA**

ASHTABULA COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **02-22050** FOR AN AIR CONTAMINANT SOURCE FOR
Continental Structural Plastics of Ohio

On 7/11/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Continental Structural Plastics of Ohio**, located at **333 Gore Rd, Conneaut**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-22050:

Mixer 1 for polyester resin/styrene paste production with a baghouse to control particulate emissions

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

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

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install | **Issue Date: To be entered upon final issuance**
Terms and Conditions | **Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 02-22050

Application Number:	02-22050
Facility ID:	0204020245
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Continental Structural Plastics of Ohio
Person to Contact:	David Murtha
Address:	333 Gore Rd Conneaut, OH 43030

Location of proposed air contaminant source(s) [emissions unit(s)]:
333 Gore Rd
Conneaut, Ohio

Description of proposed emissions unit(s):
Mixer 1 for polyester resin/styrene paste production with a baghouse to control particulate emissions

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

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain,

the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

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

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

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

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

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District

Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

13. Permit-To-Install

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

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

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Permit Transfers

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

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of

the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and

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

5. Construction of New Sources(s)

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

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

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

C. Permit-To-Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year	Tons Per Year Increase
PE	2.28	0.0
OC	13.3	0.0

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

1. On April 21, 2003 U.S. EPA promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, 40 CFR 63 Subpart WWWW. This facility is subject as an existing major source with a April 17, 2006 compliance date as specified in the NESHAP.

a. Within 15 calendar days after any changes are made, a revised Initial Notification Report shall be submitted, as required in 40 CFR 63.5905(b) and in 40 CFR 63.9(b), that contains the following information:

i. The name and address of the owner or operator;

ii. The address (i.e. physical location) of the affected source;

iii. An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date;

iv. A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emissions points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and

v. A statement of whether the affected source is a major source or an area source.

b. A revised Initial Notification Report, if needed, and a Notification of Compliance Status report shall be submitted to the following parties:

i. The original, revised "Initial Notification Report" shall be sent to Mr. Robert Hodanbosi, Chief, Division of Air Pollution Control, Ohio EPA, Lazarus Government Center, P.O. Box 1049, Columbus, OH 43216-1049;

ii. Copies of the revised "Initial Notification Report" shall be sent to the following addresses:

(1) Mr. George T. Czerniak, AE-17J, U.S. EPA Region V, 77 West Jackson Boulevard, Chicago, IL 60604-3507;

(2) DAPC, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087-1969; and

(3) MACT Coordinator, Ohio EPA, DAPC, Lazarus Government Center, P.O. Box 1049, Columbus, OH 43216-1049.

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

None.

Emissions Unit ID: P028

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P028) - Mixer 1 for polyester resin/styrene paste production with a baghouse to control particulate emissions - Chapter 31 modification of PTI 02-18224 issued on September 23, 2004

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Visible particulate emissions (PE) shall not exceed 5% opacity as a 6-minute average. The PE rate shall not exceed 0.52 lb/hr and 2.28 tons/year. Organic compound (OC) emissions shall not exceed 7.94 lbs/hr from production operations, 261.1 lbs/week from cleanup/purge operations, and 13.3 tons/year from all operations. The requirements of this rule also include compliance with the requirements of 40 CFR Parts 63.5780 - 63.5935. See sections A.I.2.a. and A.II.2.
OAC 3745-17-07(A)(1) OAC 3745-17-11	The requirements of these rules are less stringent than the requirements of OAC rule 3745-31-05(A)(3).
OAC 3745-31-05(C)	This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the styrene throughput, upon issuance of this permit. The styrene throughput from production operations at this emissions unit shall not exceed 1,892.75 tons, based upon a rolling, 12-month summation of the throughput rates.
40 CFR, Part 63, Subpart WWWW	See section A.2.b. and Part II section A.

2. Additional Terms and Conditions

2.a The OC emissions from the production operations consist of styrene, a hazardous air pollutant (HAP).

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

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

ii. close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety;

iii. keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels; and

iv. the use of HAP containing cleaning solvents is prohibited, except that styrene may be used as a cleaner in closed systems.

II. Operational Restrictions

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

2. The use of materials containing volatile organic compounds (VOCs), as defined in OAC rule 3745-21-01(B)(6), is prohibited in cleanup/purge operations.

III. Monitoring and/or Recordkeeping Requirements

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

2. Except as otherwise provided in this section, the permittee shall perform inspections of production operations and cleanup operations associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize HAP emissions are employed. The inspections shall be performed during representative, normal operating conditions.

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

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

b. the weight of each polyester resin/styrene paste material produced, in pounds

per day;

c. the total OC content of each polyester resin/styrene paste material produced, in percent by weight;

d. the total OC emissions rate for all polyester resin/styrene paste materials, in pounds per day;

e. the actual number of hours that the emissions unit was in operation;

f. the average hourly OC emissions rate for all polyester resin/styrene paste materials, i.e., (d) divided by (e), in pounds per hour (average);

g. the date and reason any required inspection was not performed; and

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

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

a. the company identification of each cleanup/purge material employed;

b. the total volume of each cleanup/purge material applied, in gallons;

c. the OC content of each cleanup/purge material applied, in pound per gallon;

d. if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports, records of the total amount (gallons) of cleanup and purge material collected from this emissions unit and added to the recovery tank/drum, for recycle/recovery and/or disposal at an outside facility, shall be maintained as required in Section A.III.3.;

e. if a credit for recovered cleanup/purge material is used, the volume of this material added to the recovery tank/drum, in gallons per week;

f. if a credit for recovered materials is used, the adjusted volume of cleanup/purge materials employed, calculate by subtracting the volume of the recovered cleanup/purge material added to the recovery tank/drum (d), from the volume of the total cleanup/purge material applied (b), in gallons per week; and

g. the total OC emissions rate for all cleanup/purge materials, in pounds per week.

h. If a credit for recovered materials from this emissions unit is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup and purge materials,

and the recovery drum or tank serving this emissions unit:

i. the date the materials from the recovery drum or tank were shipped off site; and

ii. the number of gallons of materials from the recovery drum or tank shipped off site.

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

a. the styrene throughput rate for each month, in tons; and

b. the rolling, 12-month summation of the styrene throughput rates, in tons.

6. The permittee shall maintain information to document that each cleanup/purge material applied in this emissions unit has no VOC content.

7. The permittee shall maintain information to document the composition of each polyester resin/styrene paste material produced.

8. The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each record. Retention of copies of the semi-annual compliance report(s) , required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:

a. an identification of each day during which the average hourly OC emissions from the production operations exceeded 7.94 pounds per hour, and the actual average hourly OC emissions for each such day;

b. an identification of each week during which the OC emissions from the cleanup/purge operations exceeded 261.1 pounds per week, and the actual OC emissions for each such week;

c. an identification of each day during which any cleanup/purge materials with a

VOC content were employed;

d. 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.; and

e. an identification of all exceedances of the rolling, 12-month limitation of the styrene throughput rate.

2. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:

a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirements in section A.I.2.b., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.

b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:

i. Company name and address;

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

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

iv. The total operating time of this emissions unit; and

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

c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).

3. The permittee shall submit annual reports which specify the total OC emissions and the total PE rate from this emissions unit for the previous calendar year. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 of each year.

V. Testing Requirements

Issued: To be entered upon final issuance

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

a. Emission Limitation: 5% opacity of visible PE, as a 6-minute average.

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

b. Emission Limitation: 0.52 lb PE/hr.

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

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

Where the following applies:
E_PE = PE, in pounds per hour.

P = maximum dry solids throughput rate, which is 4200 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 section 6.4 of AP-42 chapter 6.4 (5/83).

CE = control efficiency of the PE control device, in percent 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: 2.28 TPY PE.

Applicable Compliance Method: To determine the annual rate for PE, the worst case, hourly emission rate as determined in section A.V.1.b. shall be multiplied by the actual hours of operation, as specified in the record keeping requirements of section A.III.3.e., and divided by 2000 lbs/ton.

d. Emissions Limitation: 7.94 lbs OC/hr from production operations.

Applicable Compliance Method: The emissions may be demonstrated from the following equations:

i. Determination of the daily OC emissions from production operations in accordance with the record keeping requirements specified in section A.III.3.d.:

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

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

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

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

EF(OC) = the styrene emissions factor, which is 0.00345 pound of styrene emissions per pound of available styrene content, as determined from results of a U.S. EPA Methods 204, 204B and 204D exhaust gas tests, conducted on September 30, 2004 with the use of a shroud during the mixing operation.

ii. Determination of the hourly OC emissions from production operations shall be demonstrated in accordance with the record keeping requirements specified in section A.III.3.f.

e. Emission Limitation: 261.1 lbs OC/week from cleanup/purge operations.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.4.g. Compliance may be determined based upon the following equation:

EC_OC = summation of (Vi x OCi).

where:
EC_OC = OC emissions from the cleanup/purge operations, in pounds per week.

Vi = the volume of cleanup/purge material applied, from Sections A.III.4.b. or A.III.4.f., in gallons per week.

OCi = the OC content of cleanup/purge material "i", in per pounds per gallon.

f. Emissions Limitation: 13.3 TPY OC from all operations.

Applicable Compliance Method: Compliance may be determined based upon the following equation:

ET_OC = [(summation of EP_OC) + (summation of EC_OC)]
x ton OC/2,000 lbs OC.

where:
ET_OC = total, annual OC emissions from production and cleanup/purge operations, in tons/year.

2. Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).

VI. Miscellaneous Requirements

None.

Emissions Unit ID: P028

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P028) - Mixer 1 for polyester resin/styrene paste production with a baghouse to control particulate emissions - Chapter 31 modification of PTI 02-18224 issued on September 23, 2004

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	Compliance with the Air Toxic Policy as specified in Sections B.III.1. and B.III.2.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), from the production operations to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago on April 21, 2003.

2. Modeling methyl acetate pollutant emissions from the cleanup operations to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because such cleanup operations are an affected "source" subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago on April 21, 2003.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None