



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
50 West Town Street, Suite 700  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

08/21/07

**CERTIFIED MAIL**

**RE: Final Title V Chapter 3745-77  
permit**

02-04-03-0269  
PICKEN'S PLASTIC INC.  
Tom Picken  
149 South Cucumber Street  
Jefferson, OH 44047

Dear Tom Picken:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

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

cc: Northeast District Office  
File, DAPC PIER



State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: 08/21/07

Effective Date: 09/11/07

Expiration Date: 09/11/12

This document constitutes issuance of a Title V permit for Facility ID: 02-04-03-0269 to: PICKEN'S PLASTIC INC. 4212 ANN AVENUE ASHTABULA, OH 44004

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description. Rows include P004 (Press P004), P005 (Press P005), P006 (Press P006), P007 (Press P007), P008 (Press P008), P009 (Press P009), P010 (Press P010), P901 (Acetone Cold Clean), R001 (Chop Booth 1 B5-A), R003 (Paint Booth B7), R004 (Chop Booth 2), R005 (Chop Booth 3), R006 (Chop Booth 4), and R007 (Resin Transfer Molding).

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

Ohio Environmental Protection Agency

Chris Korleski (handwritten signature)

Chris Korleski
Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Section

#### 1. Monitoring and Related Record Keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.III of Part III of this Title V permit, 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.  
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

- i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter. (An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).)

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation.

Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each

year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

- 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."  
*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*
- v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

## 2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

## 3. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

**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.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

**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.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

**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, in accordance with A.10 below. 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.
- f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:
  - i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - ii. the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - iii. a combination of i. and ii. above.

The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.  
*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

**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.  
(Authority for term: OAC rule 3745-77-07(A)(8))

**8. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.  
(Authority for term: OAC rule 3745-77-07(A)(9))

**9. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.  
(Authority for term: OAC rule 3745-77-07(A)(10))

**10. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.  
(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

**11. 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.  
(Authority for term: OAC rule 3745-77-07(B))

**12. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.
  - 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.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
  - ii. Compliance certifications shall include the following:
    - (a) An identification of each term or condition of this permit that is the basis of the certification.
    - (b) The permittee's current compliance status.
    - (c) Whether compliance was continuous or intermittent.
    - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
  - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

### 13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.  
(Authority for term: OAC rule 3745-77-07(F))

**14. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).  
(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

**15. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.  
(Authority for term: OAC rule 3745-77-07(G))

**16. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.  
(Authority for term: OAC rule 3745-77-07(I))

**17. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to,

any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*

**18. Insignificant Activities or Emissions Levels**

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**19. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-01)*

**22. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**B. State Only Enforceable Section**

**1. Reporting Requirements Related to Monitoring and Record Keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

**2. Records Retention Requirements**

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.

**3. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**4. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

**5. 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.

**6. 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 emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or
- b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

## Part II - Specific Facility Terms and Conditions

### A. State and Federally Enforceable Section

1. The following insignificant emissions units are located at this facility:

P001 - Trim booth B8 (PTI No. 02-5173);  
P002 - Trim booth B9 (PTI No. 02-5173);  
P003 - Trim booth B10 (PTI No. 02-5173);  
Z004 - Curing Oven for painted parts; and  
Z005 - Curing oven for painted parts.

Each insignificant emissions unit at this facility must comply with all applicable state and federal regulations. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

2. 40 CFR Part 63, Subpart WWWW Requirements

The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, subpart WWWW, in accordance with 40 CFR Parts 63.5780 through 63.5935 (including the Table(s) and Appendix(ices) referenced in Subpart WWWW), which are included in the text of Attachment 1 hereto, and are hereby incorporated into this permit as if fully rewritten.

Ordinarily, these requirements would be incorporated into Part II of this Title V permit; however, incorporating Subpart WWWW into Part II of this Title V permit was not practical due to technical incompatibilities and the limitations of the STARS program. In addition, numerous difficulties were encountered in attempting to copy and paste the Subpart's tables and/or equations into the STARS format.

The following emissions units in this permit are subject to the aforementioned requirements: P004, P005, P006, P007, P008, P009, P010, P901, R001, R004, R005, R006 and R007.

The following operations are specifically excluded from any requirements in 40 CFR Part 63, Subpart WWWW: application of mold sealing and release agents, mold stripping and cleaning, repair of parts not manufactured at this facility, non-gel coat surface coatings, application of putties, polyputties and adhesives, repair or production materials that do not contain resin or gel coat, and research and development operations as defined in section 112(c)(7) of the Clean Air Act.

(Authority for term: 40 CFR Part 63, Subpart WWWW)

3. 40 CFR Part 63, Subpart A - General Provisions Applicability to 40 CFR Part 63, Subpart WWWW

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

Parts 63.1 (a)(1)-(4), 63.1(a)(6), 63.1 (a)(10)-(14), 63.1(b)(1), 63.1 (b)(3), 63.1 (c)(1) and (2), 63.1 (c)(5), 63.1 (e), 63.2, 63.3, 63.4, 63.5 (a)(1) and (2), 63.5(b)(1), 63.5(b)(3) and (4), 63.5 (b)(6), 63.5 (d)(1) and (2), 63.5 (d)(4), 63.5 (e)(1) - (5), 63.5 (f)(1) and (2), 63.6 (a)(1) and (2), 63.6 (b)(1)-(5), 63.6 (b)(7), 63.6 (c)(1) and (2), 63.6 (c)(5), 63.6 (e)(1) - (3), 63.6 (f)(2) and (3), 63.6 (g)(1) - (3), 63.6 (i)(1)-(14), 63.6 (i)(16), 63.6 (j), 63.7 (a)(1), 63.7 (a)(3), 63.7 (b)(1) and (2), 63.7 (c), 63.7 (d), 63.7(e), 63.7 (f), 63.7 (g), 63.7 (h), 63.8 (a)(1) and (2), 63.8 (a)(4), 63.8 (b)(1) - (3), 63.8 (c)(1) - (4), 63.8 (c)(6) - (8), 63.8 (d), 63.8 (e)(1) - (4), 63.8 (e)(5)(i), 63.8 (f)(1) - (6), 63.8 (g)(1) - (5), 63.9 (a)(1)-(4), 63.9 (b)(1) and (2), 63.9 (b)(4)(i), 63.9 (b)(4)(v), 63.9 (b)(5), 63.9(c), 63.9 (d), 63.9 (e), 63.9 (g)(1), 63.9 (g)(3), 63.9 (h)(1) - (3), 63.9 (h)(5) and (6), 63.9 (i), 63.9(j), 63.10 (a), 63.10 (b)(1), 63.10 (b)(2)(i) - (xiv), 63.10 (b)(3), 63.10 (c)(1), 63.10 (c)(5) - (8), 63.10 (c)(10) - (15), 63.10 (d)(1) and (2), 63.10 (d)(4) and (5), 63.10 (e)(1) - (3), 63.10 (f), 63.11, 63.12, 63.13, 63.14, and 63.15.

The following emissions units are subject to the aforementioned requirements: P004, P005, P006, P007, P008, P009, P010, P901, R001, R004, R005, R006 and R007.

**A. State and Federally Enforceable Section (continued)**

4. The following emissions unit located at this facility is subject to 40 CFR Part 63, Subpart PPPP-- National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products:

R003 - Paint Booth B-7.

All storage containers and mixing vessels in which coatings, thinners and/or other additives and cleaning materials are stored or mixed; all manual and automated equipment and containers used for conveying coatings, thinners and/or other additives and cleaning materials; and all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation are also subject to 40 CFR Part 63, Subpart PPPP.

[Authority for term: 40 CFR 63.4482]

5. The permittee is subject to the following requirements specified in 40 CFR Part 63, Subpart A as listed in Table 2 of 40 CFR Part 63, Subpart PPPP:

Parts 63.1 (a)(1) - (14), 63.1(b)(1) - (3), 63.1 (c)(1), 63.1 (c)(4) - (5), 63.1 (e), 63.2, 63.3 (a) - (c), 63.4 (a)(1) - (5), 63.4 (b) - (c), 63.5 (a), 63.5(b)(1) - (6), 63.5 (d), 63.5 (e), 63.5 (f), 63.6 (a), 63.6 (b)(1) - (7), 63.6 (c)(1) - (5), 63.6 (e)(1) - (2), 63.6(e)(3), 63.6 (f)(1), 63.6 (f)(2) - (3), 63.6 (g)(1) - (3), 63.6 (i)(1) - (16), 63.6 (j), 63.7 (a)(1), 63.7(a)(2), 63.7 (a)(3), 63.7 (b) - (e), 63.7 (f), 63.7 (g) - (h), 63.8 (a)(1) - (3), 63.8 (b), 63.8 (c)(1) - (3), 63.8 (c)(7), 63.8 (f)(1) - (5), 63.9 (a) - (d), 63.9 (e), 63.9 (h), 63.9 (i), 63.9 (j), 63.10 (a), 63.10 (b)(1), 63.10 (b)(2)(i) - (v), 63.10 (b)(2)(vi) - (xi), 63.10 (b)(2)(xii), 63.10 (b)(2)(xiv), 63.10 (b)(3), 63.10 (c)(1) - (6), 63.10 (c)(9) - (15), 63.10 (d)(1), 63.10 (d)(2), 63.10 (d)(4), 63.10 (d)(5), 63.10 (e)(4), 63.10 (f), 63.12, 63.13, 63.14, and 63.15.

The following emissions unit is subject to the aforementioned requirements: R003.

**MONITORING AND RECORD KEEPING**

6. Records must be kept in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. Each record must be kept for 5 years following the date of each occurrence, measurement, corrective action, report or record. Each record must be kept on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report or record according to 40 CFR 63.10(b)(1). The records may be kept off-site for the remaining 3 years.

[Authority for term: 40 CFR 63.4531]

**A. State and Federally Enforceable Section (continued)**

**7. Retention of Data and Reports**

The permittee shall collect and retain records of the data and information specified below. Failure to collect and retain these records is a deviation from the applicable standard.

- a. The permittee shall collect and retain a copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart PPPP and the documentation supporting each notification and report.
- b. The permittee shall maintain a current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the mass fraction of coating solids for each coating. If testing was conducted to determine mass fraction of organic HAP, density or mass fraction or coatings solids, a copy of the complete test report shall be maintained. If information provided by the manufacturer or supplier of the material that was based on testing was used, a the summary sheet of results provided by the manufacturer or supplier must be maintained. The test report or other supporting documentation from the manufacturer or supplier is not required to be obtained.
- c. For each compliance period, the permittee shall retain a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of Attachment 2 and, if applicable the calculation used to determine mass of organic HAP in waste materials according to section A.III.3 of emissions unit R003 and Attachment 2; the calculation of the total mass of coating solids used each month using Equation 2 of Attachment 2; and the calculation of each 12-month organic HAP emission rate using Equation 3 of Attachment 2.
- d. The permittee shall retain a record of the name and mass of each coating, thinner and/or other additive and cleaning material used during each compliance period.
- e. The permittee shall retain a record of the mass fraction of organic HAP for each coating, thinner and/or other additive and cleaning material used during each compliance period.
- f. The permittee shall retain a record of the mass fraction of coating solids for each coating used during each compliance period.
- g. If an allowance was used in Equation 1 of Attachment 2 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage and disposal facility (TSDF) according to 40 CFR 63.4551(e)(4), records shall be kept of the information specified below.
  - i. The name and address of each TSDF to which waste materials were sent for which an allowance was used in Equation 1 of Attachment 2; a statement of which subparts under 40 CFR Parts 262, 264, 265 and 266 apply to the facility; and the date of each shipment.
  - ii. An identification of the coating operations producing waste materials included in each shipment and the month or months in which the allowance for these materials was used in Equation 1 of Attachment 2.
  - iii. The methodology used in accordance with 40 CFR 63.4551(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring and supporting calculations and documentation, including the waste manifest for each shipment.
- h. Records of the date, time, and duration of each deviation must be kept.

[Authority for term: 40 CFR 63.4530]

**REPORTS AND NOTIFICATIONS**

**A. State and Federally Enforceable Section (continued)**

8. The permittee submitted an Initial Notification on August 17, 2005, for 40 CFR Part 63, Subpart PPPP. If there is a change in any information submitted in the Initial Notification, the permittee must submit the changes in writing to the Administrator within 15 calendar days after the change.

[Authority for term: 40 CFR 63.9(b) and 40 CFR 63.4510(b)]

9. The notification of compliance status report shall be submitted no later than July 30, 2008. The notification of compliance status report must contain the following information:
- a. the company name and address;
  - b. a statement by the responsible official with that official's name, title and signature, certifying the truth accuracy and completeness of the content of the report;
  - c. the date of the report and the beginning and ending dates of the reporting period, which is the initial compliance period, April 19, 2007 - June 30, 2008;
  - d. identification of the compliance options used on each coating operation (i.e., emission limit without add-on controls);
  - e. statement of whether or not the facility achieved the emission limitations for the initial compliance period;
  - f. if there was a deviation, include a description and statement of the cause of the deviation. Include all the calculations used to determine the lb organic HAP emitted per lb coating solids used. Information provided by the materials' suppliers or manufacturers or test reports need not be included.
  - g. For each of the following items include an example of how the value was determined, including calculations and supporting data. Supporting data may include a copy of the information provided by the supplier or manufacturer of the example coating or material, or a summary of the results of testing conducted. Copies of test reports do not need to be submitted.
    - i. Mass fraction of organic HAP for one coating and for one thinner and/or other additive and for one cleaning material;
    - ii. mass fraction of coating solids for one coating;
    - iii. density for one coating, one thinner and/or other additive and for one cleaning material; and
    - iv. the amount of waste materials and the mass of organic HAP contained in the waste materials for which an allowance in Equation 1 of Attachment 2 is claimed;
  - h. include the calculation of lb organic HAP emitted per lb coating solids used, as specified in Part II, section A.7.c; and
  - i. include the calculation of the total mass of organic HAP emissions for each month; the calculation of the coating solids used each month; and the calculation of the 12-month organic HAP emission rate using Equations 1 and 1A through 1C, 2, and 3, respectively of Attachment 2.

[Authority for term: 40 CFR 63.4510]

**A. State and Federally Enforceable Section (continued)**

- 10.** The permittee must submit semiannual compliance reports. The first semiannual compliance report must cover the period beginning on July 1, 2008, and ending on December 31, 2008. Each subsequent semiannual compliance report must cover the semiannual reporting period from July 1 through December 31 or the semiannual reporting period from January 1 through June 30.

The first semiannual compliance report must be postmarked or delivered no later than January 31, 2009. Each subsequent semiannual compliance report shall be postmarked or delivered no later than January 31 and July 31, whichever date is the first date following the end of the semiannual reporting period.

Each semiannual compliance report must contain the following information:

- a. the company name and address;
- b. a statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
- c. the date of the report and the beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
- d. identification that the compliance option used during the reporting period (i.e., emission rate without add-on control);
- e. the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period;
- f. if there were no deviations from the emission limitation specified in A.I.1 of emissions unit R003, the report must include a statement that there were no deviations from the emission limitation during the reporting period; and
- g. if there were deviation(s) from the emission limitation, the report must include the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable limitation and the calculations used to determine each such 12-month organic HAP emission rate. The calculations for Equations 1, 1A, 1B, 1C, 2 and 3 of Attachment 2 must be submitted, and if applicable, the calculation used to determine mass of organic HAP in waste materials. Background data supporting these calculations (e.g., information provided by materials suppliers or manufacturers or test reports) need not be submitted. The report shall also include a statement of the cause of each deviation.

[Authority for term: 40 CFR 63.4520]

- 11.** Each affected source that has obtained a Title V operating permit pursuant to 40 CFR Part 70 or 71 must report all deviations as defined in 40 CFR Part 63, Subpart PPPP in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to 40 CFR Part 63, Subpart PPPP along with, or as part of, the semiannual monitoring report required by 40 CFR Part 70.6(a)(3)(iii)(A) or 40 CFR Part 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

[Authority for term: 40 CFR 63.4520(a)(2)]

**COMPLIANCE AND TESTING**

**A. State and Federally Enforceable Section (continued)**

12. The initial compliance demonstration for 40 CFR Part 63, Subpart PPPP must be completed for the initial compliance period according to the requirements of Part III, section A.III.3 of emissions unit R003. The initial compliance period begins on April 19, 2007, and ends June 30, 2008. Determine the mass of organic HAP emissions and mass of coating solids used each month and then calculate an organic HAP emission rate at the end of the initial compliance period. The initial compliance demonstration includes the calculations according to Part III, section A.III.3 of emissions unit R003 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit of 0.16 lb organic HAP per lb coating solids, in Part III, section A.I.1 of emissions unit R003.

[Authority for term: 40 CFR 63.4550]

**B. State Only Enforceable Section**

1. The following insignificant emissions unit located at this facility is exempt from permit requirements because it is not subject to any applicable requirement (as defined in OAC rule 3745-77-01(H)), or because it meets the "de minimis" criteria established in OAC rule 3745-15-05:

Z006 - Makeup air heater.

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Press P004 (P004)

**Activity Description:** 200 ton compression press for thermoset plastic parts

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Emissions unit P004 is a 200 ton compression mold press, Press No. 1.	OAC rule 3745-31-05(A)(3) (PTI 02-20494)	Emissions of organic compounds (OC) shall not exceed 7.3 tons per year.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified in OAC rule 3745-21-07(G)(2) do not apply to this emissions unit as liquid organic material is not employed in the emissions unit.
	40 CFR 63.5780, Subpart WWWW	See Part II, sections A.2 and A.3 and Attachment 1 of this permit.

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:
  - a. the company identification for each mold compound employed;
  - b. the number of pounds of each mold compound employed; and
  - c. the OC content, in % by weight, of each mold compound employed;
  - d. the total OC emission rate for all mold compounds employed, in pounds per month, calculated as the sum of  $b \times c \times$  emission factor of 2% of the available OC for each mold compound employed. The emission factor is taken from Table 5.2 of the Background Information Document for the MACT, or the most recent factor will be used should that factor be updated.
  - e. the annual emissions for all mold compounds employed, in tons per year, calculated by summing the monthly emissions in section A.III.1.d for the calendar year and then dividing by 2000 pounds per ton.

[Authority for term: PTI 02-20494 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall conduct daily inspections of this emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in Table 4 of 40 CFR Part 63, Subpart WWWW (see Attachment 1) and shall include the following information:
  - a. whether the emissions unit was in operation;
  - b. whether the permittee uncovered, unwrapped or exposed more than one charge per mold cycle per compression/injection molding machine as specified in Table 4 of 40 CFR Part 63, Subpart WWWW (see Attachment 1); and
  - c. information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: PTI 02-20494 and OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

1. The permittee shall submit annual reports that 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 and shall include the actual tons of OC emitted and the allowable tons of OC (7.3 tons).

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which more than one charge or mold was uncovered, unwrapped or exposed per mold cycle (see Attachment 1) and information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20494]

### V. Testing Requirements

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

- 1.a Emission Limitation:

Emissions of OC shall not exceed 7.3 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20494]

Facility Name: **PICKEN'S PLASTIC INC.**  
Facility ID: **02-04-03-0269**  
Emissions Unit: **Press P004 (P004)**

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Press P005 (P005)

**Activity Description:** 150 ton compression press for thermoset plastic parts

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Emissions unit P005 is a 150 ton compression mold press, Press No. 5.	OAC rule 3745-31-05(A)(3) (PTI 02-20494)	Emissions of organic compounds (OC) shall not exceed 7.3 tons per year.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified in OAC rule 3745-21-07(G)(2) do not apply to this emissions unit as liquid organic material is not employed in the emissions unit.
	40 CFR 63.5780, Subpart WWWW	See Part II, sections A.2 and A.3 and Attachment 1 of this permit.

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:
  - a. the company identification for each mold compound employed;
  - b. the number of pounds of each mold compound employed; and
  - c. the OC content, in % by weight, of each mold compound employed;
  - d. the total OC emission rate for all mold compounds employed, in pounds per month, calculated as the sum of  $b \times c \times$  emission factor of 2% of the available OC for each mold compound employed. The emission factor is taken from Table 5.2 of the Background Information Document for the MACT, or the most recent factor will be used should that factor be updated.
  - e. the annual emissions for all mold compounds employed, in tons per year, calculated by summing the monthly emissions in section A.III.1.d for the calendar year and then dividing by 2000 pounds per ton.

[Authority for term: PTI 02-20494 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall conduct daily inspections of this emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in Table 4 of 40 CFR Part 63, Subpart WWWW (see Attachment 1) and shall include the following information:
  - a. whether the emissions unit was in operation;
  - b. whether the permittee uncovered, unwrapped or exposed more than one charge per mold cycle per compression/injection molding machine as specified in Table 4 of 40 CFR Part 63, Subpart WWWW (see Attachment 1); and
  - c. information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: PTI 02-20494 and OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

1. The permittee shall submit annual reports that 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 and shall include the actual tons of OC emitted and the allowable tons of OC (7.3 tons).

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which more than one charge or mold was uncovered, unwrapped or exposed per mold cycle (see Attachment 1) and information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20494]

### V. Testing Requirements

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

- 1.a Emission Limitation:

Emissions of OC shall not exceed 7.3 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20494]

Facility Name: **PICKEN'S PLASTIC INC.**

Facility ID: **02-04-03-0269**

Emissions Unit: **Press P005 (P005)**

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Press P006 (P006)

**Activity Description:** 280 ton compression press for thermoset plastic parts

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Emissions unit P006 is a 280 ton compression mold press, Press No. 6.	OAC rule 3745-31-05(A)(3) (PTI 02-20494)	Emissions of organic compounds (OC) shall not exceed 7.3 tons per year.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified in OAC rule 3745-21-07(G)(2) do not apply to this emissions unit as liquid organic material is not employed in the emissions unit.
	40 CFR 63.5780, Subpart WWWW	See Part II, sections A.2 and A.3 and Attachment 1 of this permit.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

None

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:
  - a. the company identification for each mold compound employed;
  - b. the number of pounds of each mold compound employed; and
  - c. the OC content, in % by weight, of each mold compound employed;
  - d. the total OC emission rate for all mold compounds employed, in pounds per month, calculated as the sum of  $b \times c \times$  emission factor of 2% of the available OC for each mold compound employed. The emission factor is taken from Table 5.2 of the Background Information Document for the MACT, or the most recent factor will be used should that factor be updated.
  - e. the annual emissions for all mold compounds employed, in tons per year, calculated by summing the monthly emissions in section A.III.1.d for the calendar year and then dividing by 2000 pounds per ton.

[Authority for term: PTI 02-20494 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall conduct daily inspections of this emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in Table 4 of 40 CFR Part 63, Subpart WWWW (see Attachment 1) and shall include the following information:
  - a. whether the emissions unit was in operation;
  - b. whether the permittee uncovered, unwrapped or exposed more than one charge per mold cycle per compression/injection molding machine as specified in Table 4 of 40 CFR Part 63, Subpart WWWW (see Attachment 1); and
  - c. information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: PTI 02-20494 and OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

1. The permittee shall submit annual reports that 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 and shall include the actual tons of OC emitted and the allowable tons of OC (7.3 tons).

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which more than one charge or mold was uncovered, unwrapped or exposed per mold cycle (see Attachment 1) and information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20494]

### V. Testing Requirements

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

- 1.a Emission Limitation:

Emissions of OC shall not exceed 7.3 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20494]

Facility Name: **PICKEN'S PLASTIC INC.**

Facility ID: **02-04-03-0269**

Emissions Unit: **Press P006 (P006)**

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Press P007 (P007)

**Activity Description:** 750 ton compression press for thermoset plastic parts

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Emissions unit P007 is a 750 ton compression mold press, Press No. 7.	OAC rule 3745-31-05(A)(3) (PTI 02-20494)	Emissions of organic compounds (OC) shall not exceed 7.3 tons per year.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified in OAC rule 3745-21-07(G)(2) do not apply to this emissions unit as liquid organic material is not employed in the emissions unit.
	40 CFR 63.5780, Subpart WWWW	See Part II, sections A.2 and A.3 and Attachment 1 of this permit.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

None

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:
  - a. the company identification for each mold compound employed;
  - b. the number of pounds of each mold compound employed; and
  - c. the OC content, in % by weight, of each mold compound employed;
  - d. the total OC emission rate for all mold compounds employed, in pounds per month, calculated as the sum of  $b \times c \times$  emission factor of 2% of the available OC for each mold compound employed. The emission factor is taken from Table 5.2 of the Background Information Document for the MACT, or the most recent factor will be used should that factor be updated.
  - e. the annual emissions for all mold compounds employed, in tons per year, calculated by summing the monthly emissions in section A.III.1.d for the calendar year and then dividing by 2000 pounds per ton.

[Authority for term: PTI 02-20494 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall conduct daily inspections of this emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in Table 4 of 40 CFR Part 63, Subpart WWWW (see Attachment 1) and shall include the following information:
  - a. whether the emissions unit was in operation;
  - b. whether the permittee uncovered, unwrapped or exposed more than one charge per mold cycle per compression/injection molding machine as specified in Table 4 of 40 CFR Part 63, Subpart WWWW (see Attachment 1); and
  - c. information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: PTI 02-20494 and OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

1. The permittee shall submit annual reports that 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 and shall include the actual tons of OC emitted and the allowable tons of OC (7.3 tons).

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which more than one charge or mold was uncovered, unwrapped or exposed per mold cycle (see Attachment 1) and information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20494]

### V. Testing Requirements

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

- 1.a Emission Limitation:

Emissions of OC shall not exceed 7.3 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20494]

Facility Name: **PICKEN'S PLASTIC INC.**

Facility ID: **02-04-03-0269**

Emissions Unit: **Press P007 (P007)**

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Press P008 (P008)

**Activity Description:** 350 ton compression press for thermoset plastic parts

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Emissions unit P008 is a 350 ton compression mold press, Press No. 8.	OAC rule 3745-31-05(A)(3) (PTI 02-20494)	Emissions of organic compounds (OC) shall not exceed 7.3 tons per year.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified in OAC rule 3745-21-07(G)(2) do not apply to this emissions unit as liquid organic material is not employed in the emissions unit.
	40 CFR 63.5780, Subpart WWWW	See Part II, sections A.2 and A.3 and Attachment 1 of this permit.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

None

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:
  - a. the company identification for each mold compound employed;
  - b. the number of pounds of each mold compound employed; and
  - c. the OC content, in % by weight, of each mold compound employed;
  - d. the total OC emission rate for all mold compounds employed, in pounds per month, calculated as the sum of  $b \times c \times$  emission factor of 2% of the available OC for each mold compound employed. The emission factor is taken from Table 5.2 of the Background Information Document for the MACT, or the most recent factor will be used should that factor be updated.
  - e. the annual emissions for all mold compounds employed, in tons per year, calculated by summing the monthly emissions in section A.III.1.d for the calendar year and then dividing by 2000 pounds per ton.

[Authority for term: PTI 02-20494 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall conduct daily inspections of this emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in Table 4 of 40 CFR Part 63, Subpart WWWW (see Attachment 1) and shall include the following information:
  - a. whether the emissions unit was in operation;
  - b. whether the permittee uncovered, unwrapped or exposed more than one charge per mold cycle per compression/injection molding machine as specified in Table 4 of 40 CFR Part 63, Subpart WWWW (see Attachment 1); and
  - c. information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: PTI 02-20494 and OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

1. The permittee shall submit annual reports that 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 and shall include the actual tons of OC emitted and the allowable tons of OC (7.3 tons).

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which more than one charge or mold was uncovered, unwrapped or exposed per mold cycle (see Attachment 1) and information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20494]

### V. Testing Requirements

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

- 1.a Emission Limitation:

Emissions of OC shall not exceed 7.3 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20494]

Facility Name: **PICKEN'S PLASTIC INC.**

Facility ID: **02-04-03-0269**

Emissions Unit: **Press P008 (P008)**

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Press P009 (P009)

**Activity Description:** 1200 ton compression press for thermoset plastic parts

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Emissions unit P009 is a 1200 ton compression mold press, Press No. 9.	OAC rule 3745-31-05(A)(3) (PTI 02-20494)	Emissions of organic compounds (OC) shall not exceed 7.3 tons per year.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified in OAC rule 3745-21-07(G)(2) do not apply to this emissions unit as liquid organic material is not employed in the emissions unit.
	40 CFR 63.5780, Subpart WWWW	See Part II, sections A.2 and A.3 and Attachment 1 of this permit.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

None

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:
  - a. the company identification for each mold compound employed;
  - b. the number of pounds of each mold compound employed; and
  - c. the OC content, in % by weight, of each mold compound employed;
  - d. the total OC emission rate for all mold compounds employed, in pounds per month, calculated as the sum of  $b \times c \times$  emission factor of 2% of the available OC for each mold compound employed. The emission factor is taken from Table 5.2 of the Background Information Document for the MACT, or the most recent factor will be used should that factor be updated.
  - e. the annual emissions for all mold compounds employed, in tons per year, calculated by summing the monthly emissions in section A.III.1.d for the calendar year and then dividing by 2000 pounds per ton.

[Authority for term: PTI 02-20494 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall conduct daily inspections of this emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in Table 4 of 40 CFR Part 63, Subpart WWWW (see Attachment 1) and shall include the following information:
  - a. whether the emissions unit was in operation;
  - b. whether the permittee uncovered, unwrapped or exposed more than one charge per mold cycle per compression/injection molding machine as specified in Table 4 of 40 CFR Part 63, Subpart WWWW (see Attachment 1); and
  - c. information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: PTI 02-20494 and OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

1. The permittee shall submit annual reports that 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 and shall include the actual tons of OC emitted and the allowable tons of OC (7.3 tons).

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which more than one charge or mold was uncovered, unwrapped or exposed per mold cycle (see Attachment 1) and information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20494]

### V. Testing Requirements

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

- 1.a Emission Limitation:

Emissions of OC shall not exceed 7.3 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20494]

Facility Name: **PICKEN'S PLASTIC INC.**

Facility ID: **02-04-03-0269**

Emissions Unit: **Press P009 (P009)**

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Press P010 (P010)

**Activity Description:** 2000 ton compression press for thermoset plastic parts

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Emissions unit P010 is a 2000 ton compression mold press, Press No. 10.	OAC rule 3745-31-05(A)(3) (PTI 02-20494)	Emissions of organic compounds (OC) shall not exceed 7.3 tons per year.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified in OAC rule 3745-21-07(G)(2) do not apply to this emissions unit as liquid organic material is not employed in the emissions unit.
	40 CFR 63.5780, Subpart WWWW	See Part II, sections A.2 and A.3 and Attachment 1 of this permit.

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:
  - a. the company identification for each mold compound employed;
  - b. the number of pounds of each mold compound employed; and
  - c. the OC content, in % by weight, of each mold compound employed;
  - d. the total OC emission rate for all mold compounds employed, in pounds per month, calculated as the sum of b x c x emission factor of 2% of the available OC for each mold compound employed. The emission factor is taken from Table 5.2 of the Background Information Document for the MACT, or the most recent factor will be used should that factor be updated.
  - e. the annual emissions for all mold compounds employed, in tons per year, calculated by summing the monthly emissions in section A.III.1.d for the calendar year and then dividing by 2000 pounds per ton.

[Authority for term: PTI 02-20494 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall conduct daily inspections of this emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in Table 4 of 40 CFR Part 63, Subpart WWWW (see Attachment 1) and shall include the following information:
  - a. whether the emissions unit was in operation;
  - b. whether the permittee uncovered, unwrapped or exposed more than one charge per mold cycle per compression/injection molding machine as specified in Table 4 of 40 CFR Part 63, Subpart WWWW (see Attachment 1); and
  - c. information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: PTI 02-20494 and OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

1. The permittee shall submit annual reports that 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 and shall include the actual tons of OC emitted and the allowable tons of OC (7.3 tons).

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which more than one charge or mold was uncovered, unwrapped or exposed per mold cycle (see Attachment 1) and information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20494]

### V. Testing Requirements

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

- 1.a Emission Limitation:

Emissions of OC shall not exceed 7.3 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20494]

Facility Name: **PICKEN'S PLASTIC INC.**  
Facility ID: **02-04-03-0269**  
Emissions Unit: **Press P010 (P010)**

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Acetone Cold Clean (P901)  
**Activity Description:** Cold cleaning with acetone of fixtures and equipment

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
P901 is the cleaning of fixtures and equipment with an acetone rag wipe.	OAC rule 3745-31-05(A)(3) (PTI 02-20157)	Emissions of organic compounds (OC) shall not exceed 1500 pounds per month and 9.0 tons per year.
		See section A.II.1 below.
	40 CFR Part 63, Subpart WWWW	See Part II, sections A.2 and A.3 and Attachment 1 of this permit.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The permittee shall employ only acetone on the rag wipes used to clean product, equipment, fixtures, and work area surfaces. The buckets containing the acetone shall remain covered except when in use. The use of soap and water or any other material not included in the definition of an air pollutant shall be exempt from this requirement.

[Authority for term: PTI 02-20157 and OAC rule 3745-77-07(A)(1)]

##### III. Monitoring and/or Record Keeping Requirements

- The permittee shall make a record of any month during which an OC other than acetone was used on the rag wipes. The record shall include an identification of the OC employed and the number of pounds of said OC employed.

[Authority for term: PTI 02-20157 and OAC rule 3745-77-07(C)(1)]

- The permittee shall collect and record the number of gallons of acetone employed each month.

[Authority for term: PTI 02-20157 and OAC rule 3745-77-07(C)(1)]

- The permittee shall determine the pounds of acetone emitted each month, calculated as the number of gallons of acetone employed, as recorded in section A.III.2, times the weight of a gallon of acetone, which is 6.64 pounds minus the pounds of any acetone recovered or recycled.

[Authority for term: PTI 02-20157 and OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall determine the tons of acetone emitted each year. This calculation shall be performed by summing the pounds of acetone used each month, as recorded in section A.III.3, and multiplying by 1 ton/2000 pounds.

[Authority for term: PTI 02-20157 and OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any month an OC other than acetone was used for the rag wipes and shall include an identification of the OC employed and the amount, in pounds, of said OC employed.

[Authority for term: PTI 02-20157 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit deviation (excursion) reports that include an identification of each month during which the total OC emissions exceeded 1500 pounds, and the actual OC emissions for each such month.

[Authority for term: PTI 02-20157 and OAC rule 3745-77-07(C)(1)]

3. The permittee shall also submit annual reports that specify the total OC emissions for the previous calendar year. These reports shall be submitted by January 31 of each year and shall include the actual tons of OC emitted and the allowable tons of OC (9 tons).

[Authority for term: PTI 02-20157 and OAC rule 3745-77-07(C)(1)]

### V. Testing Requirements

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

- 1.a Emission Limitation:

Emissions of OC (acetone) shall not exceed 1500 pounds per month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.

- 1.b Emission Limitation:

Emissions of OC (acetone) shall not exceed 9.0 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.4.

[Authority for term: PTI 02-20157 and OAC rule 3745-77-07(C)(1)]

### VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Chop Booth 1 B5-A (R001)

**Activity Description:** Spray up booth, mixture of polyester resin is combined with glass fibers.

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
R001 is a spray-up booth where resin is mixed with chopped fiber glass.	OAC rule 3745-31-05(A)(3) (PTI 02-2077)	The Best Available Technology was determined to be compliance with OAC rule 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.
	40 CFR Part 63, Subpart WWWW	See Part II, sections A.2 and A.3 and Attachment 1 of this permit and section A.I.2.a below.

**2. Additional Terms and Conditions**

- 2.a The permittee shall comply with the organic HAP emissions limits in Table 3 in 40 CFR Part 63, Subpart WWWW, or to the most recent update to Table 3 in 40 CFR Part 63, Subpart WWWW.

**II. Operational Restrictions**

**None**

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect the following information each day;
  - a. the name and identification of each resin, gel coat and cleanup material employed;
  - b. a determination whether each cleanup material employed is photochemically reactive;
  - c. the OC content, in percent by weight, for each resin, gel coat and cleanup material;
  - d. the amount of each neat resin, neat gel coat and cleanup material employed, in gallons;
  - e. the weight of any OC added to the neat resins/gel coats, in lbs;
  - f. the time period, in hours, over which each resin and gel coat was employed;
  - g. determine the emission factor for each resin and gel coat in each process stream, using Table 1 in 40 CFR Part 63, Subpart WWWW or the most recent update to Table 1 in 40 CFR Part 63, Subpart WWWW;
  - h. determine the OC emissions for each neat resin and neat gel coat in each process stream, in lbs/day, using the emission factor(s) calculated in section A.III.1.g and the neat resin and neat gel coat usage in section A.III.1.d;
  - i. the total daily OC emissions from the tooling and gel coat operation, calculated as the sum of emissions from each process stream calculated in section A.III.1.h plus the emissions calculated from OC added in section A.III.1.e;
  - j. the daily emissions from cleanup, calculated as the sum of section A.III.1.c x section A.III.1.d for each cleanup material employed;
  - k. the total daily OC emissions, calculated as the sum of section A.III.1.i + section A.III.1.j; and
  - l. the OC emissions, in average lbs/hour, for all resins and gel coats employed (calculated as section A.III.1.k / section A.III.1.f).

Note: All OC employed in the resins and gel coats are also HAP.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-2077]

### IV. Reporting Requirements

1. The following quarterly deviation reports shall be submitted as required by the General Terms and Conditions contained in this permit, by April 30, July 31, October 31 and January 31, and shall cover the records of the previous calendar quarter.
  - a. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the average OC emissions from the booth exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
  - b. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the total OC emissions from the booth exceeded 40 pounds per day, and the actual OC emissions for each such day.

If no deviations occurred during any such calendar quarter, a report indicating no deviations shall be sent.

[Authority for term: PTI 02-2077 and OAC rule 3745-77-07(C)(1)]

#### **IV. Reporting Requirements (continued)**

2. The permittee shall submit annual reports that 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 and shall include the actual tons of OC emitted and the allowable tons of OC (7.3 tons).

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **V. Testing Requirements**

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

- 1.a Emission Limitation:

Emissions of OC shall not exceed 8 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.l.

- 1.b Emission Limitation:

Emissions of OC shall not exceed 40 pounds per day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.k.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Paint Booth B7 (R003)  
**Activity Description:** Paint spray used to coat FRP parts.

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
R003 is a paint spray booth used to coat FRP parts.	OAC rule 3745-31-05(A)(3) (PTI 02-2619)	Emissions of organic compounds (OC) shall not exceed 7.3 tons per year.
	OAC rule 3745-21-07(G)(2)	Emissions of photochemically reactive OC shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) shall not exceed 0.551 pound per hour.
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	40 CFR Part 63, Subpart PPPP	Organic HAP emissions from the application of general use coatings shall not exceed 0.16 lb organic HAP per lb coatings solids used during each 12-month compliance period.
		See Part II, sections A.4 and A.12 and Attachment 2 of this permit.

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

- The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1)]

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. To determine compliance with the hourly and daily emission limitation, the permittee shall collect and record the following information for each day for the coating operation:
  - a. the company identification for each coating employed;
  - b. a determination whether each coating is photochemically reactive;
  - c. the number of gallons of each coating employed;
  - d. the OC content of each coating, in pounds per gallon;
  - e. the total OC emission rate for all coatings, in pounds per day, calculated as the sum of (c) x (d) for each material;
  - f. the hours of operation;
  - g. the average hourly OC emission rate, calculated as (e) / (f); and
  - h. the annual emission rate, calculated as the sum of the daily emissions from (e) multiplied by 1 ton/2000 pounds.

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall retain the following records for each reporting period to demonstrate compliance with the emission rate without add-on control option in 40 CFR Part 63, Subpart PPPP.
  - a. Determine the mass fraction of organic HAP for each coating, thinner and/or other additive and cleaning material used during each month by using one of the following options:
    - i. Method 311 (Appendix A to 40 CFR Part 63) and using the following procedures:
      - (a) Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not have to count it. Express the mass fraction of each organic HAP you count as a value truncated to four places after the decimal point (e.g., 0.3791).
      - (b) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (e.g., 0.763).
    - ii. Use Method 24 (Appendix A to 40 CFR Part 60) to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP.
    - iii. Use an alternative test method for determining the mass fraction of organic HAP once the Administrator has approved it. Follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval.

### III. Monitoring and/or Record Keeping Requirements (continued)

iv. Rely on information other than that generated by the test methods specified above, such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. If there is a disagreement between such information and results of a test conducted as specified above, then the test method results will take precedence unless it is demonstrated to the satisfaction of the Ohio EPA, Northeast District Office that the formulation data are correct.

v. Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, use the default values for the mass fraction of organic HAP in these solvent blends listed in Tables 3 or 4 to this permit (see Attachment 2). If using the table, use the value in Table 3 for all solvent blends that match Table 3 entries according to the instructions for Table 3 and use Table 4 only if the solvent blends in the materials used do not match any of the solvent blends in Table 3 and it is known whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (Appendix A to 40 CFR Part 63) test indicate higher values than those listed on Table 3 or 4, the Method 311 results will take precedence unless it is demonstrated to the satisfaction of the Ohio EPA, Northeast District Office that the formulation data are correct.

b. Determine the mass fraction of coating solids (lb of coating solids per lb of coating) for each coating used during each month using one of the following methods:

i. Use Method 24 (Appendix A to 40 CFR Part 60) for determining the mass fraction of coating solids.

ii. Use an alternative test method for determining the solids content of each coating once the Administrator has approved it. Follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval.

iii. Obtain the mass fraction of coating solids for each coating from the supplier or manufacturer. If there is disagreement between such information and the test method results, then the test method results will take precedence unless it is demonstrated to the satisfaction of the Ohio EPA, Northeast District Office that the formulation data are correct.

c. Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products", information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between such information and the test method results, then the test method results will take precedence unless it is demonstrated to the satisfaction of the Ohio EPA, Northeast District Office that the formulation data are correct. If material are purchased or consumption monitored by weight instead of volume, the material density does not need to be determined. Instead, use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C and 2 of Attachment 2.

d. Determine the volume (gallons) of each coating, thinner and/or other additive and cleaning material used during each month by measurement or usage records. If material are purchased or consumption monitored by weight instead of volume, the material density does not need to be determined. Instead, use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C and 2 of Attachment 2.

### III. Monitoring and/or Record Keeping Requirements (continued)

e. Calculate the mass of organic HAP emissions. The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners and/or other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions using Equation 1 of Attachment 2 to this permit.

Account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSD in Equation 1 of Attachment 2, if any, as described below:

i. Only include waste materials in the determination that are generated by coating operations in the affected emissions unit for which you use Equation 1 of Attachment 2 and that will be treated or disposed of by a facility that is regulated as a TSD under 40 CFR 262, 264, 265, or 266. The TSD may be either off-site or on-site. Do not include organic HAP contained in wastewater.

ii. Determine either the amount of the waste materials sent to a TSD during the month or the amount collected and stored during the month and designated for future transport to a TSD. Do not include in the determination any waste materials sent to a TSD during a month if that material is already included in the amount collected and stored during that month or a previous month.

iii. Determine the total mass of organic HAP contained in the waste materials specified above.

iv. Document the methodology used to determine the amount of waste materials and the total mass of organic HAP they contain, as required in (g) below. If waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them.

f. Determine the total mass of coating solids used, lb, which is the combined mass of coating solids for all the coatings used during each month, using Equation 2 of Attachment 2.

g. Calculate the organic HAP emission rate for the compliance period, lb organic HAP emitted per lb coating solids used, using Equation 3 of Attachment 2.

h. The organic HAP emission rate for the initial compliance period calculated using Equation 3 of Attachment 2 must be less than or equal to the applicable emission limit 0.16 lb organic HAP per lb coatings solids used during each 12-month compliance period for general use coatings. All records must be kept as required by Part II, section A.7.

[Authority for term: 40 CFR 63.4551]

### III. Monitoring and/or Record Keeping Requirements (continued)

4. Continuous Compliance Demonstration for 40 CFR Part 63, Subpart PPPP
  - a. To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to section A.III.3.g must be less than or equal to the applicable emission limit of 0.16 lb organic HAP per lb coating solids. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in Part II, section A.7 is the end of a compliance period consisting of that month and the preceding 11 months. The calculations in section A.III.3.g must be performed on a monthly basis using data from the previous 12 months of operation.
  - b. If the organic HAP emission rate for any 12-month compliance period exceeded 0.16 lb organic HAP per lb coating solids, this is a deviation from the emission limitation for that compliance period and must be reported as specified in 40 CFR 63.4510(c)(6) and 63.4520(a)(6).
  - c. As part of each semiannual compliance report required by Part II, section A.12, identify the emissions units which used the emission rate without add-on controls option. If there were no deviations from the emission limitation, submit a statement that the coating operations were in compliance with the emission limitation during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to 0.16 lb organic HAP per lb coating solids determined according to section A.III.3.g.
  - d. Maintain these records as specified in Part II, section A.7.

[Authority for term: 40 CFR 63.4552]

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly OC emissions from the coatings exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
  - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the OC emissions from coatings exceeded 40 pounds per day, and the actual OC emissions for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly deviation (excursion) reports of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northeast District Office).

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit the Notification of Compliance Status Report as specified in Part II, section A.9. The permittee shall submit the semiannual compliance reports as specified in Part II, section A.10.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit annual reports that 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 and shall include the actual tons of OC emitted and the allowable tons of OC (7.3 tons).

[Authority for term: OAC rule 3745-77-07(C)(1)]

### V. Testing Requirements

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

Emissions of photochemically reactive OC shall not exceed 8 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2.g. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the OC contents of the coatings and cleanup materials.

If required, compliance shall be determined through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A.

**1.b** Emission Limitation:

Emissions of photochemically reactive OC shall not exceed 40 pounds per day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2.e. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the OC contents of the coatings and cleanup materials.

**1.c** Emission Limitation:

Emissions of OC shall not exceed 7.3 tons per year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the daily short-term allowable OC emission limitation (40 lbs/day) by the maximum annual days of operation (365 days), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the daily short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

**1.d** Emission Limitation:

PE shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$$PE = (SC \times GL / HR) \times (1-TE) \times (1-CE)$$

where:

PE = particulate emissions in pounds per hour;

SC = solids content (lbs/gal);

GL = number of gallons coating employed per day;

HR = number of hours per day for coating operation;

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = estimated control efficiency of the dry filters.

**V. Testing Requirements (continued)**

**1.e** Emission Limitation:

Visible PE shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

**1.f** Emission Limitation:

Organic HAP emissions from the application of general use coatings shall not exceed 0.16 lb organic HAP per lb coatings solids used during each 12-month compliance period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements and calculations specified in section A.III.3.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Chop Booth 2 (R004)

**Activity Description:** Spray up booth, mixture of polyester resin is combined with glass fibers.

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
R004 is a spray-up booth where resin is mixed with chopped fiber glass.	OAC rule 3745-31-05(A)(3) (PTI 02-5045)	The Best Available Technology was determined to be compliance with OAC rule 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.
	40 CFR Part 63, Subpart WWWW	See Part II, sections A.2 and A.3 and Attachment 1 of this permit and section A.I.2.a below.

**2. Additional Terms and Conditions**

- 2.a The permittee shall comply with the organic HAP emissions limits in Table 3 in 40 CFR Part 63, Subpart WWWW, or to the most recent update to Table 3 in 40 CFR Part 63, Subpart WWWW.

**II. Operational Restrictions**

**None**

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect the following information each day;
  - a. the name and identification of each resin, gel coat and cleanup material employed;
  - b. a determination whether each cleanup material employed is photochemically reactive;
  - c. the OC content, in percent by weight, for each resin, gel coat and cleanup material;
  - d. the amount of each neat resin, neat gel coat and cleanup material employed, in gallons;
  - e. the weight of any OC added to the neat resins/gel coats, in lbs;
  - f. the time period, in hours, over which each resin and gel coat was employed;
  - g. determine the emission factor for each resin and gel coat in each process stream, using Table 1 in 40 CFR Part 63, Subpart WWWW or the most recent update to Table 1 in 40 CFR Part 63, Subpart WWWW;
  - h. determine the OC emissions for each neat resin and neat gel coat in each process stream, in lbs/day, using the emission factor(s) calculated in section A.III.1.g and the neat resin and neat gel coat usage in section A.III.1.d;
  - i. the total daily OC emissions from the tooling and gel coat operation, calculated as the sum of emissions from each process stream calculated in section A.III.1.h plus the emissions calculated from OC added in section A.III.1.e;
  - j. the daily emissions from cleanup, calculated as the sum of section A.III.1.c x section A.III.1.d for each cleanup material employed;
  - k. the total daily OC emissions, calculated as the sum of section A.III.1.i + section A.III.1.j; and
  - l. the OC emissions, in average lbs/hour, for all resins and gel coats employed (calculated as section A.III.1.k / section A.III.1.f).

Note: All OC employed in the resins and gel coats are also HAP.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-5045]

### IV. Reporting Requirements

1. The following quarterly deviation reports shall be submitted as required by the General Terms and Conditions contained in this permit, by April 30, July 31, October 31 and January 31, and shall cover the records of the previous calendar quarter.
  - a. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the average OC emissions from the booth exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
  - b. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the total OC emissions from the booth exceeded 40 pounds per day, and the actual OC emissions for each such day.

If no deviations occurred during any such calendar quarter, a report indicating no deviations shall be sent.

[Authority for term: PTI 02-5045 and OAC rule 3745-77-07(C)(1)]

#### **IV. Reporting Requirements (continued)**

2. The permittee shall submit annual reports that 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 and shall include the actual tons of OC emitted and the allowable tons of OC (7.3 tons).

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **V. Testing Requirements**

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

- 1.a Emission Limitation:

Emissions of OC shall not exceed 8 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.l.

- 1.b Emission Limitation:

Emissions of OC shall not exceed 40 pounds per day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.k.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Chop Booth 3 (R005)

**Activity Description:** Spray up booth, mixture of polyester resin is combined with glass fibers.

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
R005 is a spray-up booth where resin is mixed with chopped fiber glass.	OAC rule 3745-31-05(A)(3) (PTI 02-5045)	The Best Available Technology was determined to be compliance with OAC rule 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day.
	40 CFR Part 63, Subpart WWWW	See Part II, sections A.2 and A.3 and Attachment 1 of this permit and section A.I.2.a below.

**2. Additional Terms and Conditions**

- 2.a The permittee shall comply with the organic HAP emissions limits in Table 3 in 40 CFR Part 63, Subpart WWWW, or to the most recent update to Table 3 in 40 CFR Part 63, Subpart WWWW.

**II. Operational Restrictions**

**None**

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect the following information each day;
  - a. the name and identification of each resin, gel coat and cleanup material employed;
  - b. a determination whether each cleanup material employed is photochemically reactive;
  - c. the OC content, in percent by weight, for each resin, gel coat and cleanup material;
  - d. the amount of each neat resin, neat gel coat and cleanup material employed, in gallons;
  - e. the weight of any OC added to the neat resins/gel coats, in lbs;
  - f. the time period, in hours, over which each resin and gel coat was employed;
  - g. determine the emission factor for each resin and gel coat in each process stream, using Table 1 in 40 CFR Part 63, Subpart WWWW or the most recent update to Table 1 in 40 CFR Part 63, Subpart WWWW;
  - h. determine the OC emissions for each neat resin and neat gel coat in each process stream, in lbs/day, using the emission factor(s) calculated in section A.III.1.g and the neat resin and neat gel coat usage in section A.III.1.d;
  - i. the total daily OC emissions from the tooling and gel coat operation, calculated as the sum of emissions from each process stream calculated in section A.III.1.h plus the emissions calculated from OC added in section A.III.1.e;
  - j. the daily emissions from cleanup, calculated as the sum of section A.III.1.c x section A.III.1.d for each cleanup material employed;
  - k. the total daily OC emissions, calculated as the sum of section A.III.1.i + section A.III.1.j; and
  - l. the OC emissions, in average lbs/hour, for all resins and gel coats employed (calculated as section A.III.1.k / section A.III.1.f).

Note: All OC employed in the resins and gel coats are also HAP.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-5045]

### IV. Reporting Requirements

1. The following quarterly deviation reports shall be submitted as required by the General Terms and Conditions contained in this permit, by April 30, July 31, October 31 and January 31, and shall cover the records of the previous calendar quarter.
  - a. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the average OC emissions from the booth exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
  - b. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the total OC emissions from the booth exceeded 40 pounds per day, and the actual OC emissions for each such day.

If no deviations occurred during any such calendar quarter, a report indicating no deviations shall be sent.

[Authority for term: PTI 02-5045 and OAC rule 3745-77-07(C)(1)]

#### **IV. Reporting Requirements (continued)**

2. The permittee shall submit annual reports that 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 and shall include the actual tons of OC emitted and the allowable tons of OC (7.3 tons).

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **V. Testing Requirements**

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

- 1.a Emission Limitation:

Emissions of OC shall not exceed 8 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.l.

- 1.b Emission Limitation:

Emissions of OC shall not exceed 40 pounds per day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.k.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Chop Booth 4 (R006)

**Activity Description:** Spray up booth, mixture of polyester resin is combined with glass fibers.

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
R006 is Chop Booth 4 for spray-up lay-up molding of polyester resin mixes and gelcoat mixes to make fiberglass reinforced plastic parts, Booth B5.	OAC rule 3745-31-05(A)(3) (PTI 02-06028 as modified on March 10, 2005)	Emissions of organic compounds (OC) shall not exceed 7.3 tons per year, excluding emissions from cleanup.
	OAC rule 3745-21-07(G)(2)	OC emissions from spray-up lay-up shall not exceed 8 pounds per hour and 40 pounds per day.
	40 CFR Part 63, Subpart WWWW	See Part II, sections A.2 and A.3 and Attachment 1 of this permit and section A.I.2.a below.

**2. Additional Terms and Conditions**

- 2.a The permittee shall comply with the organic HAP emission limitations in Table 3 in 40 CFR Part 63, Subpart WWWW, or to the most recent update to Table 3 in 40 CFR Part 63, Subpart WWWW.

**II. Operational Restrictions**

**None**

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect the following information each day;
  - a. the name and identification of each resin, gel coat and cleanup material employed;
  - b. a determination whether each cleanup material employed is photochemically reactive;
  - c. the OC content, in percent by weight, for each resin, gel coat and cleanup material;
  - d. the amount of each neat resin, neat gel coat and cleanup material employed, in gallons;
  - e. the weight of any OC added to the neat resins/gel coats, in lbs;
  - f. the time period, in hours, over which each resin and gel coat was employed;
  - g. determine the emission factor for each resin and gel coat in each process stream, using Table 1 in 40 CFR Part 63, Subpart WWWW or the most recent update to Table 1 in 40 CFR Part 63, Subpart WWWW;
  - h. determine the OC emissions for each neat resin and neat gel coat in each process stream, in lbs/day, using the emission factor(s) calculated in section A.III.1.g and the neat resin and neat gel coat usage in section A.III.1.d;
  - i. the total daily OC emissions from the tooling and gel coat operation, calculated as the sum of emissions from each process stream calculated in section A.III.1.h plus the emissions calculated from OC added in section A.III.1.e;
  - j. the daily OC emissions from cleanup, calculated as the sum of section A.III.1.c x section A.III.1.d for each cleanup material employed;
  - k. the total daily OC emissions, calculated as section A.III.1.i + section A.III.1.j; and
  - l. the OC emissions, in average lbs/hour, for all resins and gel coats employed (calculated as section A.III.1.k / section A.III.1.f).

Note: All OC employed in the resins and gel coats are also HAP.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-06028]

2. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 02-6028, issued on March 10, 2005: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

#### **IV. Reporting Requirements**

1. The following quarterly deviation reports shall be submitted as required by the General Terms and Conditions contained in this permit, by April 30, July 31, October 31 and January 31, and shall cover the records of the previous calendar quarter.
  - a. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the average OC emissions from the booth exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
  - b. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the total OC emissions from the booth exceeded 40 pounds per day, and the actual OC emissions for each such day.

If no deviations occurred during any such calendar quarter, a report indicating no deviations shall be sent.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit annual reports that 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 and shall include the actual tons of OC emitted and the allowable tons of OC (7.3 tons).

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 02-6028, issued on March 10, 2005: A.IV.1 and A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

#### **V. Testing Requirements**

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

- 1.a Emission Limitation:

OC emissions from spray-up lay-up shall not exceed 8 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.I.

- 1.b Emission Limitation:

OC emissions from spray-up lay-up shall not exceed 40 pounds per day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.k.

**V. Testing Requirements (continued)**

**1.c** Emission Limitation:

Emissions of OC shall not exceed 7.3 tons per year, excluding emissions from cleanup.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the daily short-term allowable OC emission limitation (40 lbs/day) by the maximum annual days of operation (365 days), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the daily short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Resin Transfer Molding (R007)  
**Activity Description:** Resin transfer molding.

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
R007 is a resin transfer molding operation.	OAC rule 3745-31-05(A)(3) (PTI 02-20157)	Emissions of organic compounds (OC) shall not exceed 7.3 tons per year.
	OAC rule 3745-21-07(G)(2)	The requirements established pursuant to OAC rule 3745-21-07(G)(2) do not apply to this emissions unit as oxygen is not present.
	40 CFR Part 63, Subpart WWWW	See Part II, sections A.2 and A.3 and Attachment 1 of this permit.

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

### **III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect the following information each month.
  - a. The identification of each polyester resin employed.
  - b. The amount of each polyester resin employed, in gallons.
  - c. The OC content of each resin, in percent by weight.
  - d. The actual emissions of OC, in pounds per month. This is calculated by multiplying the gallons of each resin employed by the lbs OC per gallon of each resin employed times the OC content in each resin employed (in % by weight) times the emission factor. The emission factor (2%) is taken from Table 5-2 from "Baseline Emissions Estimates and Methodologies". The emissions from all resins employed shall be summed to determine the total monthly OC emissions.
  - e. The annual OC emissions, calculated by summing the monthly emissions.

[Authority for term: PTI 02-20157 and OAC rule 3745-77-07(C)(1)]

### **IV. Reporting Requirements**

1. The permittee shall submit annual reports that 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 and shall include the actual tons of OC emitted and the allowable tons of OC (7.3 tons).

[Authority for term: PTI 02-20157 and OAC rule 3745-77-07(C)(1)]

### **V. Testing Requirements**

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

- 1.a Emission Limitation:

Emissions of OC shall not exceed 7.3 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.e.

[Authority for term: PTI 02-20157 and OAC rule 3745-77-07(C)(1)]

### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

Facility Name: **PICKEN'S PLASTIC INC.**  
Facility ID: **02-04-03-0269**

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