



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

8/5/2011

EDWARD ZALAR
CUYAHOGA MOLDED PLASTICS CORPORATION
1265 BABBITT RD.
EUCLID, OH 44132

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318201452
Permit Number: P0107338
Permit Type: Initial Installation
County: Cuyahoga

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Plain Dealer. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
CDAQ; Pennsylvania; Canada

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination (FEPTIO to avoid MACT and Title V)

Netting Determination

2. Source Description:

Emission units P008 - P042: Compression Molding Presses for the production of electrical equipment (switches, circuit breakers, adapters, etc.)

3. Facility Emissions and Attainment Status:

Cuyahoga Molded Plastics currently has the potential to emit (PTE) of 34.06 tons of PM/year, 34.57 tons VOC/year, 34.47 tons single HAP (Styrene)/year and 34.47 ton combined HAPs/year which was established in PTIO/FEPTIO application supplemental information submitted in 2011. Cuyahoga County is currently designated as attainment for regulated air pollutants except PM2.5 and partial nonattainment for lead.

4. Source Emissions:

In order to ensure that the requirements of Title V and MACT Subpart WWWW do not apply, the facility requested to include restrictions on HAP emissions below the major source thresholds. HAP emissions have been restricted to less than 10 tons/yr for any single HAP and less than 25 tons/yr for combined HAPs as rolling, 12-month summation of emissions. The permit contains record keeping requirements to track material usage and calculate HAP emissions on a monthly basis. Quarterly deviation reports are required if HAP emissions exceed the allowable limits. The total actual HAP emissions were determined to be 738 lbs (0.4 ton) for calendar year 2010.

5. Conclusion:

The proposed FEPTIO permit contains the HAP emission limitations that have been established below the major source thresholds as a rolling, 12-month summation of emissions. Therefore this facility is a Synthetic Minor/FEPTIO, and is not subject to either the Title V permitting requirements or MACT Subpart WWWW.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>Single HAP</u>	<u>9.9</u>
<u>Combined HAPs</u>	<u>24.9</u>

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
CUYAHOGA MOLDED PLASTICS CORPORATION

Issue Date: 8/5/2011

Permit Number: P0107338

Permit Type: Initial Installation

Permit Description: FEPTIO permit for Cuyahoga Molded Plastics for 35 Thermoset Compression Molding Presses that were installed in 1969 (emissions units (P008 - P042). The presses are used for the production of plastic electrical equipment parts.

Facility ID: 1318201452

Facility Location: CUYAHOGA MOLDED PLASTICS CORPORATION
1265 BABBITT RD.,
Euclid, OH 44132

Facility Description: All Other Plastics Product Manufacturing

The Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to David Hearne at Cleveland Division of Air Quality, 2nd Floor 75 Erieview Plaza, Cleveland, OH 44114 or (216)664-2297. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Ohio

**Environmental
Protection Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
CUYAHOGA MOLDED PLASTICS CORPORATION**

Facility ID:	1318201452
Permit Number:	P0107338
Permit Type:	Initial Installation
Issued:	8/5/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
CUYAHOGA MOLDED PLASTICS CORPORATION

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Authorization

Facility ID: 1318201452
Application Number(s): A0040770
Permit Number: P0107338
Permit Description: FEPTIO permit for Cuyahoga Molded Plastics for 35 Thermoset Compression Molding Presses that were installed in 1969 (emissions units (P008 - P042). The presses are used for the production of plastic electrical equipment parts.
Permit Type: Initial Installation
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 8/5/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

CUYAHOGA MOLDED PLASTICS CORPORATION
1265 BABBITT RD.
Euclid, OH 44132

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0107338

Permit Description: FEPTIO permit for Cuyahoga Molded Plastics for 35 Thermoset Compression Molding Presses that were installed in 1969 (emissions units (P008 - P042). The presses are used for the production of plastic electrical equipment parts.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Group Name: P08-P042: 35 Comp.Molding Press

Emissions Unit ID:	P008
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P009
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P010
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P011
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P012
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P013
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P014
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P015
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P016
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P017
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	P018
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P019
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P020
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P021
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P022
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P023
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P024
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P025
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P026
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P027
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P028
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P029
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P030
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P031
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

Emissions Unit ID:	P032
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P033
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P034
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P035
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P036
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P037
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P038
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P039
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P040
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P041
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P042
Company Equipment ID:	Compression Molding Press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Cleveland Division of Air Quality in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -P008-P042: 35 Comp. Molding Press: P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, P037, P038, P039, P040, P041, P042

P008-P042: Compression Molding Presses for the production of electrical equipment (Switches, circuit breakers, adapters, etc.)

EU ID	Operations, Property and/or Equipment Description
P008	P008 - Compression Molding Press #1
P009	P009 - Compression Molding Press #3
P010	P010 - Compression Molding Press #5
P011	P011 - Compression Molding Press #8
P012	P012 - Compression Molding Press #9
P013	P013 - Compression Molding Press #10
P014	P014 - Compression Molding Press #12
P015	P015 - Compression Molding Press #15
P016	P016 - Compression Molding Press #16
P017	P017 - Compression Molding Press #17
P018	P018 - Compression Molding Press #18
P019	P019 - Compression Molding Press #19
P020	P020 - Compression Molding Press #20
P021	P021 - Compression Molding Press #21
P022	P022 - Compression Molding Press #22
P023	P023 - Compression Molding Press #24
P024	P024 - Compression Molding Press #25
P025	P025 - Compression Molding Press #26
P026	P026 - Compression Molding Press #27
P027	P027 - Compression Molding Press #28
P028	P028 - Compression Molding Press #29
P029	P029 - Compression Molding Press #30
P030	P030 - Compression Molding Press #31
P031	P031 - Compression Molding Press #32
P032	P032 - Compression Molding Press #33
P033	P033 - Compression Molding Press #34
P034	P034 - Compression Molding Press #35
P035	P035 - Compression Molding Press #36
P036	P036 - Compression Molding Press #37
P037	P037 - Compression Molding Press #38
P038	P038 - Compression Molding Press #39
P039	P039 - Compression Molding Press #40
P040	P040 - Compression Molding Press #41
P041	P041 - Compression Molding Press #43
P042	P042 - Compression Molding Press #44

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None

b) **Applicable Emissions Limitations and/or Control Requirements**

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-25	See c)(1) below.
b.	OAC rule 3745-31-05(D)(1)(b)	The total facility-wide HAP emissions shall not exceed 9.9 tons/yr for each single HAP and 24.9 tons/yr for combined HAPs as a rolling, 12-month summation.

(2) **Additional Terms and Conditions**

a. The emissions units that generate HAP emissions at this facility are P008 - P042 and six exempt injection molding presses.

c) **Operational Restrictions**

(1) The permittee shall comply with the following work practices as indicated in Table 1 of OAC rule 3745-21-25:

- a. uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine;
- b. for machines with multiple molds, one charge means sufficient material to fill all molds for one cycle;
- c. for machines with robotic loaders, no more than one charge may be exposed prior to the loader;
- d. for machines fed by hoppers, sufficient material may be uncovered to fill the hopper;

- e. hoppers shall be closed when not adding materials;
 - f. materials may be uncovered to feed to slitting machines; and
 - g. materials shall be recovered after slitting.
- (2) The permittee shall not use cleaning solvents (cleaners) that have a VOC content greater than 0.42 pound VOC per gallon, except cleaners used in closed systems and used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
- (3) The permittee shall keep containers that store VOC containing materials closed or covered except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety.
- (4) This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit. The emissions of each single HAP and combined HAPs from emissions units P008 - P042 and the four injection molding presses shall not exceed 9.9 and 24.9 tons per year respectively, based upon a rolling, 12-month summation of the emissions.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall collect and record the following information each month for all compression molding presses combined (P008-P042):
- a. the identification and type of each molding compound employed;
 - b. the VOC content of each molding compound employed, in percent by weight;
 - c. the individual HAP content for each molding compound employed, in percent by weight;
 - d. the total combined HAP content of each molding compound employed, in percent by weight; [sum all the individual HAP contents per pound of molding compound from (c)];
 - e. the number of pounds of each molding compound employed;
 - f. the total VOC emissions from all molding compounds employed, in pounds and tons per month [sum of b. x e.];
 - g. the total individual HAP emissions for each HAP from all molding compounds employed, in pounds per month [sum of each HAP in c. times e. for each molding compound];
 - h. the total combined HAP emissions from all molding compounds employed, in pounds per month [sum of d. times e. for each molding compound];

- i. the updated rolling, 12-month summation of the emissions for each individual HAP, in pounds. This shall include the information for the current month and the preceding eleven calendar months;
- j. the updated rolling, 12-month summation of the emissions for total combined HAPs, in pounds. This shall include the information for the current month and the preceding eleven calendar months; and
- k. the updated rolling, 12-month summation of the emissions of VOCs, in pounds and tons. This shall include the information for the current month and the preceding eleven calendar months.

Note: VOC emissions shall be determined for the purpose of the annual fee emission report.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. identification of each rolling, 12-month period during which any single HAP emissions from emissions units P008-P042 and the four injection molding presses combined exceeded 9.9 tons, and the actual single HAP emissions for each such rolling, 12-month period; and
 - ii. identification of each rolling, 12-month period during which the combined HAPs emissions from emissions units P008-P042 and the four injection molding presses combined exceeded 24.9 tons, and the actual combined HAP emissions for each such rolling, 12-month period.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Cleveland Division of Air Quality.

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

The total facility-wide HAP emissions shall not exceed 9.9 tons/yr for each single HAP and 24.9 tons/yr for combined HAPs as a rolling, 12-month summation.

- Applicable Compliance Method:

Compliance shall be determined based on the monitoring and record keeping requirements indicated in d) and the reporting in e)(2) above.

g) Miscellaneous Requirements

- (1) Per the permit (PTIO) application, all of the 35 compression molding presses were installed in 1969.