Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

8/23/2011

Certified Mail

Facility ID: 0204000133
Permit Number: P0083969
County: Ashtabula

Mr. Walter McSherry, Jr.
Premix, Inc.
ROUTE 20 & HARMON RD.
P.O. Box 281
NORTH KINGSVILLE, OH 44068-0281

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 6/8/2011. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. 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 permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA DAPC, Northeast District Office

Response to Comments

Response to comments for: Title V Permit

Facility ID:	0204000133
Facility Name:	Premix, Inc.
Facility Description:	Manufacturer of Composite Mold Compounds & Molded Plastic Parts
Facility Address:	Route 20 & Harmon Road North Kingsville, OH 44068-0281 Ashtabula County
Permit #:	P0083969, Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Star Beacon on 06/10/2011. The comment period ended on 07/10/2011.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: Premix EU's P029, P030, and P031 uncontrolled emissions
   a. Comment: (Ref. P. 22, item 14) We believe that OAC 3745-21-25 applies only to uncontrolled emissions, and not to Premix EU's P029, P030, and P031, which may be operated only when the control device is operating.
   b. Response: We disagree. For the purposes of determining which requirements apply under paragraph (D) of OAC rule 3745-21-25, the permittee must calculate facility's VOC emissions from all EUs (open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and
   BMC manufacturing) listed in (F)(1) of this rule. Paragraph (F)(1) states that facility's VOC emissions shall be calculated prior to any add-on control device.

   Premix has reported in their initial notification for this rule that VOC emissions were less than the threshold of one hundred tons of VOC per year prior to any add-on control device from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing.

2. Topic: Applicability of OAC rules 3745-21-25(D)(8), (D)(9) and (D)(10)
   a. Comment: (Ref. P. 70, item 9 b), (1), b), (1), item b. in the table, negates item g. in the same table. This is because EU's P029, P030, and P031 must always be controlled, making item g. for those units unnecessary calculations.
   b. Response: The EU's P029, P030, and P031 must be controlled at all times as a result of a signed consent order with US EPA. Since P029, P030, and P031 are controlled by the ECS, OAC rules 3745-21-25(D)(8), (D)(9) and (D)(10) do not apply. Language has been added stating that the said rules do not apply because VOC emissions from SMC/TMC machines are controlled by the ECS.
3. Topic References to "uncontrolled emissions" do not apply, remove from monitoring/recordkeeping section - SMC/TMC machines
   a. Comment: (Ref. P. 76, item (6)) for the same reasons stated in items 1., and 2. Above, we believe that references to "uncontrolled emissions" in item (6) can be removed from the permit.
   b. Response: References to "uncontrolled emissions" have been removed 9.d)(6)b., but uncontrolled emissions (i.e., VOC prior to add-on controls) must be calculated semi-annually as required in section B.14.a). Additional language has been added to section B.14.a): "The permittee shall calculate the facility's VOC emissions threshold using procedures in OAC rule 3745-21-25(F)(3)."
   c. Comment (Ref. P. 77, item (7)) For the reasons stated in items 1. And 2. Above, we believe that item (7) can be removed from the permit in its entirety.
   d. Response: 9.d)(7)c has been removed.

Other changes

1. Topic OAC rule 3745-21-25
   a. OAC rule 3745-21-25 will be federally effective as of August 12, 2011. Terms were removed from EUs in a)(1), which stated that this rule was enforceable under state law only.

2. Topic Work practice standards
   a. Work practice standards were moved from section b)(2) additional terms and conditions to section c) operational restriction.

3. Topic Emission factors
   a. Emission factors were converted from lb/hr to lb/ton.

4. Topic References to "uncontrolled emissions" do not apply, remove from reporting section - SMC/TMC machines
   a. 9.e)(3) has been removed.

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PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Premix, Inc.

Facility ID:	0204000133
Permit Number:	P0083969
Permit Type:	Renewal
Issued:	8/23/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

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Division of Air Pollution Control
Title V Permit
for
Premix, Inc.

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Authorization

Facility ID: 0204000133
Facility Description: Manufacturer of Composite Mold Compounds & Molded Plastic Parts
Application Number(s): A0014457, A0014458, A0014459, A0014460, A0014461, A0041067
Permit Number: P0083969
Permit Description: This is a renewal Title V permit, including SPM and off-permit changes, for reinforced plastic composites production.
Permit Type: Renewal
Issue Date: 8/23/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0083968

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Premix, Inc.
Route 20 & Harmon Road
North Kingsville, OH 44068-0281

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

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

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. 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. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northeast District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. 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 C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) 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:

(1) 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 Standard Term and Condition A.2.c)(2) 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) 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))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions 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 Standard 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 Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

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

(3) 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 Standard Term and Condition A.2)c)(2) 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; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) 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 section B. Facility-Wide Terms and Conditions 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 Standard Term and Condition A.2.c)(2) 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))

(4) 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))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northeast District Office.

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

3. 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 Standard Term and Condition A.2.c)(1) above.

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

4. 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))

5. 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))

6. 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))

7. 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 Standard Term and Condition A.11 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. 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 when:

(1) 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 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

(2) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. 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))

8. 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))

9. 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))

10. 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 standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. 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))

12. 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))

13. 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:

(1) 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.

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

(3) 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:

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

(2) 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:

(1) 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.

(2) 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.

(3) 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))

14. 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))

15. 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))

16. 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))

17. 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))

18. 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.)

19. 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))

20. 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))

21. 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))

22. 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)

23. 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))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

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.) Records Retention Requirements Under State Law Only

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.

25. 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.

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

26. 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).

27. 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.

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

28. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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 Standard Term and Condition A.2.c)(2); 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.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) B.10.

2. Facility-wide emissions limitation for VOC:

   a) The combined emissions of volatile organic compounds (VOC) from all emissions units at this facility shall not exceed 99 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

      The combined emissions of VOC shall include the following emissions units: P010 – P018, P021 – P037, P039, P041 – P059, P061 – P067, P071 – P105, P108 – P111 and all VOC emitting, insignificant emissions units.

      [Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0105804]

3. Monitoring and/or Recordkeeping Requirements for facility-wide VOC emissions limitation:

   a) The permittee shall maintain monthly records of the following information:

      (1) The rolling, 12-month summation of tons of VOC emissions, calculated by adding the current month's VOC emissions from all emissions units at this facility to the VOC emissions for the preceding eleven calendar months from all emissions units at this facility.

      All VOC emitting, insignificant emissions units have combined potential VOC emissions of 0.1 ton/month. In lieu of calculating actual monthly VOC emissions, this value shall be added each month to the rolling, 12-month summation of monthly emissions. All VOC emitting, insignificant emissions units are listed in B.8.

      [Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

4. Reporting Requirements for facility-wide VOC emissions limitation:

   a) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

      These reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

      [Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

5. The permittee shall meet the following work practice standard:

   a) For all fiberglass reinforced plastic operations, the permittee must keep all containers that store HAP-containing materials closed or covered, except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

      [Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25, 40 CFR Part 63, Subpart WWWW and PTI P0105804]

6. Monitoring and/or Recordkeeping Requirements for facility-wide work practice standard:

   a) The permittee shall inspect daily when in operation all containers that store HAP-containing materials, and record the following information:

      (1) the date and reason why any required inspection was not performed; and

      (2) the date and all times when containers that store HAP-containing materials were not closed or covered, except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

   [Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

7. Reporting Requirements for facility-wide work practice standard:

   a) The permittee must submit the following semiannual compliance reports:

      (1) if there are no deviations from this work practice standard in B.5.a, provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., all containers that store HAP-containing materials were closed or covered during the reporting period); and

      (2) if there were deviations with this work practice standard in B.5.a, provide the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

   Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

   [Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25, 40 CFR Part 63, Subpart WWWW and PTI P0105804]

8. INSIGNIFICANT SOURCE LIST

The following VOC emitting insignificant emissions sources are located at Premix:

EU ID	Operations, Property and/or Equipment Description
B001	1.35 mmBTU/hr natural gas fired boiler
N001	Bake-off oven for paint racks
P009	Fume hoods in quality assurance laboratory
P070	Mix tank washer (PTI-020850)

EU ID	Operations, Property and/or Equipment Description
P112	BMC bagging station 1 (formerly Z009)
P113	BMC bagging station 2 (formerly Z010)
P114	BMC bagging station 3 (formerly Z011)
P115	Molded parts maintenance parts washer (formerly Z055)
P116	Compound maintenance parts washer (formerly Z056)
P117	Tool room parts washer (formerly Z057)
P118	Rooftop HVAC units all <<1 MBTU/hr (formerly Z058)
P119	Flame Test Room for QC testing parts (formerly Z059)
P120	Lab services analytical testing hoods and testing equipment vents (formerly Z060)
P121	Small blast cabinet for automatic deflashing of parts, Hunziker (formerly Z061)
P122	Small blast cabinet for automatic deflashing of parts, L&L (formerly Z062)
P123	Small blast cabinet for Tool Room (formerly Z063)
P124	Time Saver Planer for parts deflashing (formerly Z064)
P125	Fadal unit for parts finishing (formerly Z065)
P126	Parts finishing at presses (formerly Z066)
P128	Bulk filler storage, silo T22-S5 (formerly Z070)
P129	Bulk filler storage, silo T23-S4 (formerly Z071)
P130	Bulk filler storage, silo T24-S3 (formerly Z072)
P131	Bulk filler storage, silo T25-S2 (formerly Z073)
P132	Bulk filler storage, silo T26-S1 (formerly Z074)
P133	Bag Dump Station 1 (formerly Z075)
P134	Bag Dump Station 2 (formerly Z076)
P135	Bag Dump Station 3 (formerly Z077)

EU ID	Operations, Property and/or Equipment Description
P136	Bag Dump Station 4 (formerly Z078)
P137	Maintenance welding (formerly Z079)
P138	Diesel fire pump for emergency use (formerly Z080)
P139	Diesel compressors -compound cold storage trailers (formerly Z081)
P140	Semi-bulk bag filler storage at Continuous mixer (formerly Z082)
P141	Small hood for venting weigh up of dry additives at hand adds weigh area (formerly Z083)
P142	Resin Station - resin/monomer transfer to mix tanks (formerly Z084)
P143	Small hood for venting weigh up of dry additive in the Pilot Plant (formerly Z085)
P144	Old Press Room Hot Oil System Boiler, 2.4 MMBTU/hr boiler (formerly Z086)
P145	New Press Room Hot Oil System Boilers, 2 - 1.6 MMBTU/hr boilers (formerly Z087)
P146	BMC Bulk System Draw 1 & 2 (formerly Z088)
P147	Semi-bulk filler storage for BMC process use (formerly Z089)
P148	Emergency Generator - VRS System
T001	10,000-gallon storage tank for polyester resin/styrene; Tank 1
T002	10,000-gallon storage tank for polyester resin/styrene; Tank 2
T003	10,000-gallon storage tank for polyester resin/styrene; Tank 3
T004	6,000-gallon storage tank for polyester resin/styrene; Tank 4
T005	6,000-gallon storage tank for vinylester/styrene; Tank 5
T006	6,000-gallon storage tank for polyester resin/styrene; Tank 6
T007	6,000-gallon storage tank for polymer solution/styrene; Tank 7
T008	6,000-gallon storage tank for polyester resin/styrene; Tank 11
T009	6,000-gallon storage tank for styrene/isocyanurate vinylester/polyether polyol resin; Tank 12
T010	6,000-gallon storage tank for vinylester resin/styrene; Tank 13

EU ID	Operations, Property and/or Equipment Description
T011	6,000-gallon storage tank for polyester resin/styrene; Tank 14
T012	10,000-gallon storage tank for polyester resin/styrene; Tank 15
T013	10,000-gallon storage tank for vinyl toluene resin; Tank 16 (formerly Z001)
T014	10,000-gallon storage tank for styrene; Tank 17 (formerly Z002)
T015	Portable diesel tank (formerly Z067)
T016	Compound lab solvent tank, storage of lab solvent used for QA testing (formerly Z069)

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

9. The following insignificant emissions units at this facility must comply with all applicable State and Federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit to install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, 3745-21 and/or 40 CFR Part 63, Subpart WWWW, 40 CFR Part 60, Subpart IIII

EU ID	Operations, Property and/or Equipment Description
P070	Mix tank washer (PTI-020850)
P138	Diesel fire pump for emergency use (formerly Z080)
P139	Diesel compressors -compound cold storage trailers (formerly Z081)
P148	Emergency Generator - VRS System
T001	10,000-gallon storage tank for polyester resin/styrene; Tank 1
T002	10,000-gallon storage tank for polyester resin/styrene; Tank 2
T003	10,000-gallon storage tank for polyester resin/styrene; Tank 3
T004	6,000-gallon storage tank for polyester resin/styrene; Tank 4
T005	6,000-gallon storage tank for vinylester/styrene; Tank 5
T006	6,000-gallon storage tank for polyester resin/styrene; Tank 6
T007	6,000-gallon storage tank for polymer solution/styrene; Tank 7

EU ID	Operations, Property and/or Equipment Description
T008	6,000-gallon storage tank for polyester resin/styrene; Tank 11
T009	6,000-gallon storage tank for styrene/isocyanurate vinylester/polyether polyol resin; Tank 12
T010	6,000-gallon storage tank for vinylester resin/styrene; Tank 13
T011	6,000-gallon storage tank for polyester resin/styrene; Tank 14
T012	10,000-gallon storage tank for polyester resin/styrene; Tank 15
T013	10,000-gallon storage tank for vinyl toluene resin; Tank 16 (formerly Z001)
T014	10,000-gallon storage tank for styrene; Tank 17 (formerly Z002)

[Authority for term: OAC rule 3745-77-07(A)(13)]

10. The following insignificant emissions units are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

EU ID	Operations, Property and/or Equipment Description
B001	1.35 mmBTU/hr natural gas fired boiler
N001	Bake-off oven for paint racks
P009	Fume hoods in quality assurance laboratory
P112	BMC bagging station 1 (formerly Z009)
P113	BMC bagging station 2 (formerly Z010)
P114	BMC bagging station 3 (formerly Z011)
P115	Molded parts maintenance parts washer (formerly Z055)
P116	Compound maintenance parts washer (formerly Z056)
P117	Tool room parts washer (formerly Z057)
P118	Rooftop HVAC units all <<1 MBTU/hr (formerly Z058)
P119	Flame Test Room for QC testing parts (formerly Z059)
P120	Lab services analytical testing hoods and testing equipment vents (formerly Z060)

EU ID	Operations, Property and/or Equipment Description
P121	Small blast cabinet for automatic deflashing of parts, Hunziker (formerly Z061)
P122	Small blast cabinet for automatic deflashing of parts, L&L (formerly Z062)
P123	Small blast cabinet for Tool Room (formerly Z063)
P124	Time Saver Planer for parts deflashing (formerly Z064)
P125	Fadal unit for parts finishing (formerly Z065)
P126	Parts finishing at presses (formerly Z066)
P128	Bulk filler storage, silo T22-S5 (formerly Z070)
P129	Bulk filler storage, silo T23-S4 (formerly Z071)
P130	Bulk filler storage, silo T24-S3 (formerly Z072)
P131	Bulk filler storage, silo T25-S2 (formerly Z073)
P132	Bulk filler storage, silo T26-S1 (formerly Z074)
P133	Bag Dump Station 1 (formerly Z075)
P134	Bag Dump Station 2 (formerly Z076)
P135	Bag Dump Station 3 (formerly Z077)
P136	Bag Dump Station 4 (formerly Z078)
P137	Maintenance welding (formerly Z079)
P140	Semi-bulk bag filler storage at Continuous mixer (formerly Z082)
P141	Small hood for venting weigh up of dry additives at hand adds weigh area (formerly Z083)
P142	Resin Station - resin/monomer transfer to mix tanks (formerly Z084)
P143	Small hood for venting weigh up of dry additive in the Pilot Plant (formerly Z085)
P144	Old Press Room Hot Oil System Boiler, 2.4 MMBTU/hr boiler (formerly Z086)
P145	New Press Room Hot Oil System Boilers, 2 - 1.6 MMBTU/hr boilers (formerly Z087)
P146	BMC Bulk System Draw 1 & 2 (formerly Z088)

EU ID	Operations, Property and/or Equipment Description
P147	Semi-bulk filler storage for BMC process use (formerly Z089)
T015	Portable diesel tank (formerly Z067)
T016	Compound lab solvent tank, storage of lab solvent used for QA testing (formerly Z069)

11. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart WWWW: P010 – P018, P021 – P032, P039, P041 – P059, P061 – P067, P070 – P097, P099 – P100, P105, P108 – P111, and T001 – T014. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website: http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District or local air agency.

    [Authority for term: 40 CFR Part 63, Subpart WWWW]

12. The following emissions units contained in this permit are subject to OAC rule 3745-21-25: P010 – P018, P021 – P032, P039, P041 – P059, P061 – P067, P070 – P097, P099 – P100, P105, P108 – P111, and T001 – T014.

    [Authority for term: OAC rule 3745-21-25]

13. **OAC rule 3745-21-25 – Combination uncontrolled VOC emissions:**

    The permittee has reported in their initial notification for this rule that VOC emissions were less than the threshold of one hundred tons of VOC per year prior to any add-on control device from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing.

14. **OAC rule 3745-21-25 – Monitoring and/or Recordkeeping Requirements for facility-wide uncontrolled VOC emissions:**

    a) The permittee shall calculate, on a semiannual basis, a 12-month summation of tons of VOC emissions, prior to any add-on control device, from the following operations: open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing. The permittee shall calculate the facility's VOC emissions threshold using procedures in OAC rule 3745-21-25(F)(3).

       The calculated VOC emissions shall cover the 12-month period prior to June 30 and the 12-month period prior to December 31.

    b) The permittee shall keep the following records:

       (1) a copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status;

(2) for any add-on control device, all records required in 40 CFR Part 63, Subpart SS, to show continuous compliance with this rule;

(3) for operations listed in tables 2, 3, and 4 of OAC rule 3745-21-25 all data, assumptions, and calculations used to determine monomer contents and VOC emissions factors; and

(4) a certified statement that operations are in compliance with the work practice standards specified in table 1 of OAC rule 3745-21-25, as applicable.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

15. **OAC rule 3745-21-25 – Reporting Requirements for facility-wide uncontrolled VOC emissions limitation:**

a) The permittee shall report if the facility met or exceeded the one hundred tons of VOC per year emissions threshold (VOC emissions prior to any add-on control device) as calculated in B.14.a and if the amount of VOC emissions would make the facility subject to paragraph (D)(3) of OAC rule 3745-21-25. The report shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by whichever date comes first after the facility's determination that it met or exceeded the VOC threshold: July 31 or January 31.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

16. **OAC rule 3745-21-25 – Compliance dates:**

a) If the facility has uncontrolled VOC emissions less than the threshold of one hundred tons of VOC per year from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, and the facility subsequently increases its uncontrolled VOC emissions to meet or exceed the threshold of one hundred tons of VOC per year from the combination of such operations, the compliance date of any affected operation pertaining to a new VOC emission requirement is two years from the date that the semiannual compliance report indicates the facility meets or exceeds the threshold of one hundred tons of VOC per year.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

C. Emissions Unit Terms and Conditions

1. P032, SMC03 pilot plant machine

Operations, Property and/or Equipment Description:

Sheet mold compound (SMC) pilot plant machine

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)c and b)(1)e.

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 3745-31-05(D)	See B.2: facility-wide limit for volatile organic compounds (VOC) emissions.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07(G)(2). See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
d.	OAC rule 3745-21-07(G)(2)	a) Organic compounds (OC) emissions shall not exceed 8 lbs/hr or 40 lbs/day. b) c) See b)(2)c.
e.	OAC rule 3745-21-07(M)(3)(g)	The provisions of paragraph (M)(3)(g) of OAC rule 3745-21-07 shall not apply to this emissions unit, when complying with all work practice standards as specified in OAC rule 3745-21-07(M)(5)(h). See c)(1).

f.	OAC rule 3745-21-25 OAC rule 3745-21-25 will be federally effective as of August 12, 2011.	Work practice standards in Table 1 of OAC rule 3745-21-25. See c)(1) and b)(2)d.
g.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(1).
h.	40 CFR Part 63.1 through 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/year.

c. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)d, d)(1), e)(1)a, e)(1)b and f)(1)a.

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping,

and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S. EPA approves the rule revision: b)(1)e.

d. In accordance with paragraph (A)(3) of OAC rule 3745-21-25, upon achieving compliance with this rule, the reinforced plastic composites production operations at the facility are not required to meet the requirements of OAC rule 3745-21-07.

c) Operational Restrictions

(1) The permittee shall meet the following work practice standards:

a. The resin delivery system to the doctor box on the sheet molding compound manufacturing machine must be closed or covered (the doctor box itself may be open). A doctor box is defined as the box or trough on a sheet molding compound manufacturing machine into which the liquid resin paste is delivered before it is metered onto the carrier film.; and

b. A nylon containing film must be used to enclose the sheet molding compound.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-21-07(M), OAC rule 3745-21-25 and 40 CFR Part 63, Subpart WWWW]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records for this emissions unit:

a. hours of operation; and

b. the total OC emission rate for all SMC produced, as calculated by the following equation, in pounds per day:

$$\text{OC}\left(\frac{\text{lbs}}{\text{day}}\right) = \text{hours of operation x ER}$$

where:

ER = emission rate of 2.16 lbs VOC/hr, which is equivalent to 2.16 lbs OC/hr, as determined from the ANSI standard for the production of SMC:

ER = 0.1457 At - 0.1454

where:

ER = VOC emission rate, lb/hr, when paste is on the line;
At = Total wet area of SMC machine = Adl + Adu + W*(Ll+Lu);
Adl = open area of the lower doctor box, ft2;
Adu = open area of the upper doctor box, ft2;
W = wet width of SMC, ft2;
Ll = Lower wet length, ft; and

Lu = Upper wet length, ft.

If emissions testing is required, use most current ER as determined from emissions testing instead of the ANSI emissions factor of 2.16 lbs VOC /hr.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(2) The permittee shall maintain monthly records for this emissions unit:

a. hours of operation; and

b. the total VOC emission rates for all SMC produced, as calculated by the following equations, in pounds per month:

$$\text{VOC}\left(\frac{\text{lbs}}{\text{month}}\right) = \text{hours of operation x ER x}(1 - \text{CE}), \text{ controlled}$$

$$\text{VOC}\left(\frac{\text{lbs}}{\text{month}}\right) = \text{hours of operation x ER}, \text{ uncontrolled}$$

where:

ER = emission rate of 2.16 lbs VOC/hr, which is equivalent to 2.16 lbs OC/hr, as determined from the ANSI standard for the production of SMC:

ER = 0.1457 At - 0.1454

where:

ER = VOC emission rate, lb/hr, when paste is on the line;
At = Total wet area of SMC machine = Adl + Adu + W*(Ll+Lu);
Adl = open area of the lower doctor box, ft2;
Adu = open area of the upper doctor box, ft2;
W = wet width of SMC, ft2;
Ll = Lower wet length, ft; and
Lu = Upper wet length, ft.

If emissions testing is required, use most current ER as determined from emissions testing instead of the ANSI emissions factor of 2.16 lbs VOC /hr.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(3) The permittee shall inspect the SMC machine when resin is present in the resin delivery system, and record the following information:

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

b. the date and all times the resin delivery system to the doctor box was not closed or covered, when resin was present in the resin delivery system (the doctor box itself may be open); and

c. the date and all times when nylon containing film was not used to enclose SMC.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(4) The permittee shall maintain the following monthly records for this emissions unit:

a. the amount of SMC produced for each type of SMC product;

b. the monomer content of each SMC product; and

c. the rolling, 12-month summation of tons of uncontrolled VOC emissions, calculated by adding the current month's uncontrolled VOC emissions to the uncontrolled VOC emissions for the preceding eleven calendar months.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each day when the average hourly OC emissions exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and

b. each day when the OC emissions exceeded 40 pounds per day, and the actual OC emissions for each such day.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(2) The permittee must submit semiannual compliance reports:

a. if there are no deviations from the work practice standards in c)(1)a and c)(1)b, provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., the resin delivery system to the doctor box was closed or covered for the reporting period and a nylon containing film was used to enclose SMC for the reporting period); and

b. if there were deviations from the work practice standards in c)(1)a and c)(1)b, provide the total operating time of the emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25, 40 CFR, Part 63, Subpart WWWW and PTI P0105804]

(3) The pemittee shall notify to the Director (the Ohio EPA eBusiness Center, Air Services) of any record showing that a SMC manufacturing machine exceeded the VOC emissions limit in OAC rule 3745-21-25(D)(9): uncontrolled SMC manufacturing machine with VOC emissions of less than 25.0 tons per rolling, 12-month period.

A copy of such record shall be sent to the Director (the Ohio EPA eBusiness Center, Air Services) within forty-five days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitations:</u>

OC emissions shall not exceed 8 lbs/hr or 40 lbs/day.

<u>Applicable Compliance Method:</u>

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) of these terms and conditions.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25, 25A, 204, 204A-F and/or 205, or other approved methods, as appropriate.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

g) Miscellaneous Requirements

(1) None.

2. P039, Pipe and pump cleaning operations

Operations, Property and/or Equipment Description:

Pipe and metal pump cleaning

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)d and b)(1)f.

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 3745-31-05(D)	See B.2: facility-wide limit for volatile organic compounds (VOC) emissions.
b.	OAC rule 3745-31-05(D)	See b)(2)c. The requirements of this rule shall terminate upon the SIP revision of OAC rule 3745-21-07 as described in b)(2)e.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	VOC emissions shall not exceed 1,650 lbs/month and 9.9 tpy. See b)(2)a.
d.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
e.	OAC rule 3745-21-07(G)(2)	a) See b)(2)d and b)(2)e.
f.	OAC rule 3745-21-07(M)(5)(a)	Exempt from the emission limit standards in OAC rule 3745-21-07(M)(2).
g.	OAC rule 3745-21-25(D)(1) OAC rule 3745-21-25 will be federally effective as of August 12, 2011.	b) Work practice standards in Table 1 of OAC rule 3745-21-25. See b)(2)f and b)(2)h.
h.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Work practice standards in Table 4 of Subpart WWWW. See b)(2)g.
i.	40 CFR Part 63.1 through 63.15	The General Provisions that apply are

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/year.

c. The permittee shall not use any cleaning solvents that contain photochemically reactive materials (PRMs).

d. This emissions unit is exempt from the organic compound emission limitations specified in OAC rule 3745-21-07(G)(2) because the use of photochemically reactive materials is prohibited.

e. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)b, b)(1)e, b)(2)c, b)(2)d, d)(1)c and e)(1)a.

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms

shall become federally enforceable after U.S. EPA approves the rule revision: b)(1)f.

f. Do 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.

g. The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.

h. In accordance with paragraph (A)(3) of OAC rule 3745-21-25, upon achieving compliance with this rule, the reinforced plastic composites production operations at the facility are not required to meet the requirements of OAC rule 3745-21-07.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records for this emissions unit:

a. the name and identification number of each cleanup material applied;

b. an identification of each cleanup material applied as to whether it's a VOC or contains HAP;

c. an identification of each cleanup material applied as to whether it's a PRM;

d. the density and VOC weight fraction or the density and VOC volume fraction of each cleanup material applied;

e. the weight or volume of each cleanup material applied;

f. the total VOC emission rate for all cleanup materials applied, in lbs/month;

g. if a credit for recovered cleanup materials is to be used to demonstrate compliance, records of the total amount (lbs) of cleanup material collected and added to the recovery container, for recycle, recovery, and/or disposal at an outside facility, shall be maintained in the following manner:

i. the date the materials from the recovery container were shipped off site; and

ii. the number of gallons or pounds of materials from the recovery container shipped off site; and

h. a credit of recovered cleanup material may be used to adjust the amount of VOC emissions in section d)(1)f.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW and PTI P0105804]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each day when photochemically reactive materials (PRMs) were applied, and the actual amount of emissions from using PRM for each such day; and

b. each month when the VOC emissions exceeded 1,650 pounds per month, and the actual VOC emissions for each such month.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(2) The permittee must submit semiannual compliance reports:

a. if there are no deviations from the work practice standard in b)(2)f, provide a statement that there were no deviations from the work practice standard during the reporting period (i.e., each cleaning solvent used did not 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) for the reporting period);

b. if there are no deviations from the work practice standard in b)(2)g, provide a statement that there were no deviations from the work practice standard during the reporting period (i.e., cleaning solvents used did not contain HAP, except that styrene was used as a cleaner in closed systems, and organic HAP containing cleaners was used to clean cured resin from application equipment, for the reporting period); and

c. if there were deviations with the work practice standards in b)(2)f and b)(2)g, provide the total operating time of the emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25, 40 CFR Part 63, Subpart WWWW and PTI P0105804]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 1,650 lbs/month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) of these terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

b. Emission Limitation:

VOC emissions shall not exceed 9.9 tpy.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the monthly allowable VOC emission limitation (1,650 lbs/month) by the maximum annual months of operation (12 months), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the monthly allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

g) Miscellaneous Requirements

(1) None.

3. P072, Facility wide cleanup

Operations, Property and/or Equipment Description:

Facility wide cleanup: TMC and SMC machines, BMC mixers, extruders, etc.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)d and b)(1)f.

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 3745-31-05(D)	See B.2: facility-wide limit for volatile organic compounds (VOC) emissions.
b.	OAC rule 3745-31-05(D)	See b)(2)c. The requirements of this rule shall terminate upon the SIP revision of OAC rule 3745-21-07 as described in b)(2)e.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	VOC emissions shall not exceed 1,650 lbs/month and 9.9 tpy. See b)(2)a.
d.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
e.	OAC rule 3745-21-07(G)(2)	a) See b)(2)d and b)(2)e.
f.	OAC rule 3745-21-07(M)(5)(a)	Exempt from the emission limit standards in OAC rule 3745-21-07(M)(2).
g.	OAC rule 3745-21-25(D)(1) OAC rule 3745-21-25 will be federally effective as of August 12, 2011.	b) Work practice standards in Table 1 of OAC rule 3745-21-25. See b)(2)f and b)(2)h.
h.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Work practice standards in Table 4 of Subpart WWWW. See b)(2)g.

i.	40 CFR Part 63.1 through 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/year.

c. The permittee shall not use any cleaning solvents that contain photochemically reactive materials (PRMs).

d. This emissions unit is exempt from the organic compound emission limitations specified in OAC rule 3745-21-07(G)(2) because the use of photochemically reactive materials is prohibited.

e. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)b, b)(1)e, b)(2)c, b)(2)d, d)(1)c and e)(1)a.

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms

shall become federally enforceable after U.S. EPA approves the rule revision: b)(1)f.

f. Do 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.

g. The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.

h. In accordance with paragraph (A)(3) of OAC rule 3745-21-25, upon achieving compliance with this rule, the reinforced plastic composites production operations at the facility are not required to meet the requirements of OAC rule 3745-21-07.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records for this emissions unit:

a. the name and identification number of each cleanup material applied;

b. an identification of each cleanup material applied as to whether it's a VOC or contains HAP;

c. an identification of each cleanup material applied as to whether it's a PRM;

d. the density and VOC weight fraction or the density and VOC volume fraction of each cleanup material applied;

e. the weight or volume of each cleanup material applied;

f. the total VOC emission rate for all cleanup materials applied, in lbs/month;

g. if a credit for recovered cleanup materials is to be used to demonstrate compliance, records of the total amount (lbs) of cleanup material collected and added to the recovery container, for recycle, recovery, and/or disposal at an outside facility, shall be maintained in the following manner:

i. the date the materials from the recovery container were shipped off site; and

ii. the number of gallons or pounds of materials from the recovery container shipped off site; and

h. a credit of recovered cleanup material may be used to adjust the amount of VOC emissions in section d)(1)f.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW and PTI P0105804]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each day when photochemically reactive materials (PRMs) were applied, and the actual amount of emissions from using PRM for each such day; and

b. each month when the VOC emissions exceeded 1,650 pounds per month, and the actual VOC emissions for each such month.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(2) The permittee must submit semiannual compliance reports:

a. if there are no deviations from the work practice standard in b)(2)f, provide a statement that there were no deviations from the work practice standard during the reporting period (i.e., each cleaning solvent used did not 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) for the reporting period);

b. if there are no deviations from the work practice standard in b)(2)g, provide a statement that there were no deviations from the work practice standard during the reporting period (i.e., cleaning solvents used did not contain HAP, except that styrene was used as a cleaner in closed systems, and organic HAP containing cleaners was used to clean cured resin from application equipment, for the reporting period); and

c. if there were deviations with the work practice standards in b)(2)f and b)(2)g, provide the total operating time of the emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25, 40 CFR Part 63, Subpart WWWW and PTI P0105804]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 1,650 lbs/month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) of these terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

b. Emission Limitation:

VOC emissions shall not exceed 9.9 tpy.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the monthly allowable VOC emission limitation (1,650 lbs/month) by the maximum annual months of operation (12 months), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the monthly allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group - Compression Mold Presses: P041, P042, P043, P044, P045, P046, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P071, P073, P074, P075, P076, P077, P078, P079, P080, P081, P082, P083, P084, P085, P086, P087, P088, P089, P090, P091, P092, P093, P094, P095, P096, P097, P105, P108, P109, P110, P111,

EU ID	Operations, Property and/or Equipment Description
P041	Compression mold press A-6 for fiberglass reinforced plastic parts
P042	Compression mold press B-6 for fiberglass reinforced plastic parts
P043	Compression mold press D-4 for fiberglass reinforced plastic parts
P044	Compression mold press D-6 for fiberglass reinforced plastic parts
P045	Compression mold press E-1 for fiberglass reinforced plastic parts
P046	Compression mold press E-2 for fiberglass reinforced plastic parts
P047	Compression mold press E-3 for fiberglass reinforced plastic parts
P048	Compression mold press E-4 for fiberglass reinforced plastic parts
P049	Compression mold press E-5 for fiberglass reinforced plastic parts
P050	Compression mold press E-6 for fiberglass reinforced plastic parts
P051	Compression mold press E-7 for fiberglass reinforced plastic parts
P052	Compression mold press G-1 for fiberglass reinforced plastic parts
P053	Compression mold press G-2 for fiberglass reinforced plastic parts
P054	Compression mold press G-3 for fiberglass reinforced plastic parts
P055	Compression mold press G-4 for fiberglass reinforced plastic parts
P056	Compression mold press G-5 for fiberglass reinforced plastic parts
P057	Compression mold press G-6 for fiberglass reinforced plastic parts
P058	Compression mold press G-7 for fiberglass reinforced plastic parts
P059	Compression mold press G-8 for fiberglass reinforced plastic parts
P071	Compression mold press G-9 for fiberglass reinforced plastic parts
P073	Compression mold press AA-6 for fiberglass reinforced plastic parts
P074	Compression mold press AA-7 for fiberglass reinforced plastic parts
P075	Compression mold press AA-8 for fiberglass reinforced plastic parts
P076	Compression mold press A-7 for fiberglass reinforced plastic parts
P077	Compression mold press B-7 for fiberglass reinforced plastic parts
P078	Compression mold press B-8 for fiberglass reinforced plastic parts
P079	Compression mold press C-8 for fiberglass reinforced plastic parts
P080	Compression mold press C-9 for fiberglass reinforced plastic parts
P081	Compression mold press C-10 for fiberglass reinforced plastic parts
P082	Compression mold press D-2 for fiberglass reinforced plastic parts
P083	Compression mold press D-3 for fiberglass reinforced plastic parts
P084	Compression mold press O-1 for fiberglass reinforced plastic parts
P085	Compression mold press O-2 for fiberglass reinforced plastic parts
P086	Compression mold press O-3 for fiberglass reinforced plastic parts
P087	Compression mold press O-4 for fiberglass reinforced plastic parts
P088	Compression mold press O-5 for fiberglass reinforced plastic parts
P089	Compression mold press O-6 for fiberglass reinforced plastic parts
P090	Compression mold press O-7 for fiberglass reinforced plastic parts
P091	Compression mold press O-10 for fiberglass reinforced plastic parts
P092	Compression mold press O-11 for fiberglass reinforced plastic parts
P093	Compression mold press O-12 for fiberglass reinforced plastic parts

EU ID	Operations, Property and/or Equipment Description
P094	Compression mold press O-13 for fiberglass reinforced plastic parts
P095	Compression mold press O-14 for fiberglass reinforced plastic parts
P096	Compression mold press O-15 for fiberglass reinforced plastic parts
P097	Compression mold press O-16 for fiberglass reinforced plastic parts
P105	Compression mold press G-10 for fiberglass reinforced plastic parts
P108	Compression mold press O-17 for fiberglass reinforced plastic parts
P109	Compression mold press E-8 for fiberglass reinforced plastic parts
P110	Compression mold press E-9 for fiberglass reinforced plastic parts
P111	Compression mold press G-11 for fiberglass reinforced plastic parts

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) b)(1)c.

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 3745-31-05(D)	See B.2: facility-wide limit for volatile organic compounds (VOC) emissions.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	VOC emissions shall not exceed the lbs/month and tpy emission limitations specified in b)(2)a. See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)c.
d.	OAC rule 3745-21-25 OAC rule 3745-21-25 will be federally effective as of August 12, 2011.	Work practice standards in Table 1 of OAC rule 3745-21-25. See c)(1) and b)(2)d.
e.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Work practice standard in Table 4 of Subpart WWWW. See c)(1).
f.	40 CFR Part 63.1 through 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

a. VOC emissions shall not exceed the lbs/month and tpy emission limitations specified below:

EU ID	Equipment Description	lbs VOC/month	TPY of VOC
P041	Compression mold press A-6	833	5.0
P042	Compression mold press B-6	833	5.0
P043	Compression mold press D-4	833	5.0
P044	Compression mold press D-6	833	5.0
P045	Compression mold press E-1	1166	7.0
P046	Compression mold press E-2	1166	7.0
P047	Compression mold press E-3	1166	7.0
P048	Compression mold press E-4	1166	7.0
P049	Compression mold press E-5	1166	7.0
P050	Compression mold press E-6	1166	7.0
P051	Compression mold press E-7	1166	7.0
P052	Compression mold press G-1	1650	9.9
P053	Compression mold press G-2	1650	9.9
P054	Compression mold press G-3	1650	9.9
P055	Compression mold press G-4	1650	9.9
P056	Compression mold press G-5	1650	9.9
P057	Compression mold press G-6	1650	9.9
P058	Compression mold press G-7	1650	9.9
P059	Compression mold press G-8	1650	9.9
P071	Compression mold press G-9	1650	9.9
P073	Compression mold press AA-6	833	5.0
P074	Compression mold press AA-7	833	5.0
P075	Compression mold press AA-8	833	5.0
P076	Compression mold press A-7	833	5.0
P077	Compression mold press B-7	833	5.0
P078	Compression mold press B-8	833	5.0
P079	Compression mold press C-8	833	5.0
P080	Compression mold press C-9	833	5.0
P081	Compression mold press C-10	833	5.0
P082	Compression mold press D-2	833	5.0
P083	Compression mold press D-3	833	5.0
P084	Compression mold press O-1	833	5.0
P085	Compression mold press O-2	833	5.0
P086	Compression mold press O-3	833	5.0
P087	Compression mold press O-4	833	5.0
P088	Compression mold press O-5	833	5.0
P089	Compression mold press O-6	833	5.0
P090	Compression mold press O-7	833	5.0
P091	Compression mold press O-10	833	5.0
P092	Compression mold press O-11	1650	9.9
P093	Compression mold press O-12	833	5.0

EU ID	Equipment Description	lbs VOC/month	TPY of VOC
P094	Compression mold press O-13	833	5.0
P095	Compression mold press O-14	833	5.0
P096	Compression mold press O-15	833	5.0
P097	Compression mold press O-16	833	5.0
P105	Compression mold press G-10	1650	9.9
P108	Compression mold press O-17	833	5.0
P109	Compression mold press E-8	1166	7.0
P110	Compression mold press E-9	1166	7.0
P111	Compression mold press G-11	1650	9.9

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limitations/control measures no longer apply.

c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/year.

d. In accordance with paragraph (A)(3) of OAC rule 3745-21-25, upon achieving compliance with this rule, the reinforced plastic composites production operations at the facility are not required to meet the requirements of OAC rule 3745-21-07.

c) Operational Restrictions

(1) The permittee shall uncover, unwrap or expose only one charge per mold cycle per compression molding machine.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-21-25 and 40 CFR Part 63, Subpart WWWW]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records for each emissions unit:

a. the company identification for each BMC, TMC and SMC;

b. tons used of each BMC, TMC and SMC;

c. the weight percent of available organic HAP used (e.g., styrene, vinyl toluene and/or methyl methacrylate) in each BMC, TMC and SMC; and

d. the total VOC emission rate for all BMC, TMC and SMC used, as calculated by the following equation, in pounds per month:

$$\text{VOC}\left(\frac{\text{lbs}}{\text{month}}\right) = \sum_{i}^{n} \text{available organic HAP x EF}$$

where:

i = tons of available organic HAP input used for each BMC, TMC and SMC;

n = number of BMC, TMC and SMC used; and

EF = each emissions factor.

EF = 30 lb of VOC emissions emitted / tons of available organic HAP input

0.015 lb of VOC emissions emitted / lb of available organic HAP input x 2000 as determined from emissions testing, conducted from August 11, 2008 and to September 4, 2008 at Premix, Inc.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(2) The permittee shall inspect each molding machine when in operation, and record the following information:

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

b. the date and all times when two or more charges were uncovered, unwrapped or exposed per mold cycle per compression molding machine.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each month when the VOC emissions exceeded the pounds per month limit for each emissions unit in b)(2)a, and the actual VOC emissions for each emissions unit for each such month.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(2) The permittee must submit semiannual compliance reports:

a. if there are no deviations from the work practice standard in c)(1), provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., the facility had uncovered, unwrapped or exposed only one charge per mold cycle per compression molding machine); and

b. if there were deviations with the work practice standard in c)(1), provide the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25, 40 CFR Part 63, Subpart WWWW and PTI P0105804]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>

EU ID	Equipment Description	lbs VOC/month	TPY of VOC
P041	Compression mold press A-6	833	5.0
P042	Compression mold press B-6	833	5.0
P043	Compression mold press D-4	833	5.0
P044	Compression mold press D-6	833	5.0
P045	Compression mold press E-1	1166	7.0
P046	Compression mold press E-2	1166	7.0
P047	Compression mold press E-3	1166	7.0
P048	Compression mold press E-4	1166	7.0
P049	Compression mold press E-5	1166	7.0
P050	Compression mold press E-6	1166	7.0
P051	Compression mold press E-7	1166	7.0
P052	Compression mold press G-1	1650	9.9
P053	Compression mold press G-2	1650	9.9
P054	Compression mold press G-3	1650	9.9
P055	Compression mold press G-4	1650	9.9
P056	Compression mold press G-5	1650	9.9

EU ID	Equipment Description	lbs VOC/month	TPY of VOC
P057	Compression mold press G-6	1650	9.9
P058	Compression mold press G-7	1650	9.9
P059	Compression mold press G-8	1650	9.9
P071	Compression mold press G-9	1650	9.9
P073	Compression mold press AA-6	833	5.0
P074	Compression mold press AA-7	833	5.0
P075	Compression mold press AA-8	833	5.0
P076	Compression mold press A-7	833	5.0
P077	Compression mold press B-7	833	5.0
P078	Compression mold press B-8	833	5.0
P079	Compression mold press C-8	833	5.0
P080	Compression mold press C-9	833	5.0
P081	Compression mold press C-10	833	5.0
P082	Compression mold press D-2	833	5.0
P083	Compression mold press D-3	833	5.0
P084	Compression mold press O-1	833	5.0
P085	Compression mold press O-2	833	5.0
P086	Compression mold press O-3	833	5.0
P087	Compression mold press O-4	833	5.0
P088	Compression mold press O-5	833	5.0
P089	Compression mold press O-6	833	5.0
P090	Compression mold press O-7	833	5.0
P091	Compression mold press O-10	833	5.0
P092	Compression mold press O-11	1650	9.9
P093	Compression mold press O-12	833	5.0
P094	Compression mold press O-13	833	5.0
P095	Compression mold press O-14	833	5.0
P096	Compression mold press O-15	833	5.0
P097	Compression mold press O-16	833	5.0
P105	Compression mold press G-10	1650	9.9
P108	Compression mold press O-17	833	5.0
P109	Compression mold press E-8	1166	7.0
P110	Compression mold press E-9	1166	7.0
P111	Compression mold press G-11	1650	9.9

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) of these terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group - Extruders: P033, P034, P035, P036, P037

EU ID	Operations, Property and/or Equipment Description
P033	Bulk mold compound (BMC)/sheet mold compound (SMC) extruder 4
P034	Bulk mold compound (BMC)/sheet mold compound (SMC) extruder 5
P035	Bulk mold compound (BMC)/sheet mold compound (SMC) extruder 1
P036	Bulk mold compound (BMC)/sheet mold compound (SMC) extruder 2
P037	Bulk mold compound (BMC)/sheet mold compound (SMC) extruder 3

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) b)(1)c.

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 3745-31-05(D)	See B.2: facility-wide limit for volatile organic compounds (VOC) emissions.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	VOC emissions shall not exceed the lbs/month and tpy emission limitations listed in b)(2)a. See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)c.

(2) Additional Terms and Conditions

a. VOC emissions shall not exceed the lbs/month and tpy emission limitations specified below:

EU ID	Equipment Description	lbs VOC/month	TPY VOC
P033	extruder 4	500	3.0
P034	extruder 5	500	3.0
P035	extruder 1	500	3.0
P036	extruder 2	500	3.0
P037	extruder 3	500	3.0

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limitations/control measures no longer apply.

c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/year.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records for each emissions unit:

a. the company identification for each BMC, TMC and SMC;

b. tons used of each BMC, TMC and SMC;

c. the weight percent of available organic HAP used (e.g., styrene, vinyl toluene and/or methyl methacrylate) in each BMC, TMC and SMC; and

d. the total VOC emission rate for all BMC, TMC and SMC used, as calculated by the following equation, in pounds per month:

$$\text{VOC}\left(\frac{\text{lbs}}{\text{month}}\right) = \sum_{i}^{n} \text{available organic HAP x EF}$$

where:

i = tons of available organic HAP input used for each BMC, TMC and SMC;

n = number of BMC, TMC and SMC used; and

EF = each emissions factor.

EF = 2 lb of VOC emissions emitted / ton of available organic HAP input

0.001 lb of VOC emissions emitted / lb of available organic HAP input x 2000 as determined from engineering estimates.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each month when the VOC emissions exceeded the pounds per month limit for each emissions unit in b)(2)a, and the actual VOC emissions for each emissions unit for each such month.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

EU ID	Equipment Description	lbs VOC/month	TPY VOC
P033	extruder 4	500	3.0
P034	extruder 5	500	3.0
P035	extruder 1	500	3.0
P036	extruder 2	500	3.0
P037	extruder 3	500	3.0

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) of these terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

g) Miscellaneous Requirements

(1) None.

6. Emissions Unit Group - Injection Mold Presses: P061, P062, P063, P064, P065, P066, P067, P098, P101, P102,

EU ID	Operations, Property and/or Equipment Description
P061	Injection mold press H-1 for fiberglass reinforced plastic parts
P062	Injection mold press H-2 for fiberglass reinforced plastic parts
P063	Injection mold press H-3 for fiberglass reinforced plastic parts
P064	Injection mold press H-4 for fiberglass reinforced plastic parts
P065	Injection mold press H-5 for fiberglass reinforced plastic parts
P066	Injection mold press H-6 for fiberglass reinforced plastic parts
P067	Injection mold press H-7 for fiberglass reinforced plastic parts
P098	Injection mold press H-10 for fiberglass reinforced plastic parts
P101	Injection mold press H-8 for fiberglass reinforced plastic parts
P102	Injection mold press H-12 for fiberglass reinforced plastic parts

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) b)(1)c.

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 3745-31-05(D)	See B.2: facility-wide limit for volatile organic compounds (VOC) emissions.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	VOC emissions shall not exceed the lbs/month and tpy emission limitations specified in b)(2)a. See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)c.
d.	OAC rule 3745-21-25 OAC rule 3745-21-25 will be federally effective as of August 12, 2011.	Work practice standards in Table 1 of OAC rule 3745-21-25. See c)(1) and b)(2)d.
e.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Work practice standard in Table 4 of Subpart WWWW. See c)(1).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	40 CFR Part 63.1 through 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

a. VOC emissions shall not exceed the lbs/month and tpy emission limitations specified below:

EU ID	Equipment Description	Lbs VOC/month	TPY VOC
P061	Injection mold press H-1	1166	7.0
P062	Injection mold press H-2	1166	7.0
P063	Injection mold press H-3	1166	7.0
P064	Injection mold press H-4	1166	7.0
P065	Injection mold press H-5	1166	7.0
P066	Injection mold press H-6	1166	7.0
P067	Injection mold press H-7	1166	7.0
P098	Injection mold press H-10	1166	7.0
P101	Injection mold press H-8	1166	7.0
P102	Injection mold press H-12	1166	7.0

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limitations/control measures no longer apply.

c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/year.

d. In accordance with paragraph (A)(3) of OAC rule 3745-21-25, upon achieving compliance with this rule, the reinforced plastic composites production operations at the facility are not required to meet the requirements of OAC rule 3745-21-07.

c) Operational Restrictions

(1) The permittee shall uncover, unwrap or expose only one charge per mold cycle per injection molding machine. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers shall be closed when not adding materials.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-21-25 and 40 CFR Part 63, Subpart WWWW]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records for each emissions unit:

a. the company identification for each BMC, TMC and SMC;

b. tons used of each BMC, TMC and SMC;

c. the weight percent of available organic HAP used (e.g., styrene, vinyl toluene and/or methyl methacrylate) in each BMC, TMC and SMC; and

d. the total VOC emission rate for all BMC, TMC and SMC used, as calculated by the following equation, in pounds per month:

$$\text{VOC}\left(\frac{\text{lbs}}{\text{month}}\right) = \sum_{i}^{n} \text{available organic HAP x EF}$$

where:

i = tons of available organic HAP input used for each BMC, TMC and SMC;

n = number of BMC, TMC and SMC used; and

EF = each emissions factor.

EF = 30 lb of VOC emissions emitted / ton of available organic HAP input

0.015 lb of VOC emissions emitted / lb of available organic HAP input x 2000 as determined from emissions testing, conducted from August 11, 2008 and to September 4, 2008 at Premix, Inc.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(2) The permittee shall inspect each injection molding machine when in operation, and record the following information:

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

b. the date and all times when two or more charges were uncovered, unwrapped or exposed per mold cycle per injection mold machine; or date and all times when the cover of the hopper was not closed at all times other than when adding materials per injection mold machine.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each month when the VOC emissions exceeded the pounds per month limit for each emissions unit in b)(2)a, and the actual VOC emissions for each emissions unit for each such month.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(2) The permittee must submit semiannual compliance reports:

a. if there are no deviations from the work practice standard in c)(1), provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., the facility had uncovered, unwrapped or exposed only one charge per mold cycle per injection mold machine; or covers on hoppers were closed at all times other than when adding materials); and

b. if there were deviations with the work practice standard in c)(1), provide the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25, 40 CFR Part 63, Subpart WWWW and PTI P0105804]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>

EU ID	Equipment Description	Lbs VOC/month	TPY VOC
P061	Injection mold press H-1	1166	7.0
P062	Injection mold press H-2	1166	7.0
P063	Injection mold press H-3	1166	7.0
P064	Injection mold press H-4	1166	7.0
P065	Injection mold press H-5	1166	7.0

EU ID	Equipment Description	Lbs VOC/month	TPY VOC
P066	Injection mold press H-6	1166	7.0
P067	Injection mold press H-7	1166	7.0
P098	Injection mold press H-10	1166	7.0
P101	Injection mold press H-8	1166	7.0
P102	Injection mold press H-12	1166	7.0

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) of these terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

g) Miscellaneous Requirements

(1) None.

7. Emissions Unit Group - Mixer I: P010, P011,

EU ID	Operations, Property and/or Equipment Description
P010	Thermoplastic additive disperser C-O
P011	Thickener disperser C-1

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) b)(1)c.

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 3745-31-05(D)	See B.2: facility-wide limit for volatile organic compounds (VOC) emissions.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	VOC emissions shall not exceed the lbs/month and tpy emission limitations specified in b)(2)a. See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)c.
d.	OAC rule 3745-21-25 OAC rule 3745-21-25 will be federally effective as of August 12, 2011.	Work practice standards in Table 1 of OAC rule 3745-21-25. See c)(1) and b)(2)d.
e.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(1).
f.	40 CFR Part 63.1 through 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

a. VOC emissions shall not exceed the lbs/month and tpy emission limitations specified below:

EU ID	Equipment Description	lbs VOC/month	TPY VOC
P010	Thermoplastic additive disperser C-O	833	5.0
P011	Thickener disperser C-1	833	5.0

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limitations/control measures no longer apply.

c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/year.

d. In accordance with paragraph (A)(3) of OAC rule 3745-21-25, upon achieving compliance with this rule, the reinforced plastic composites production operations at the facility are not required to meet the requirements of OAC rule 3745-21-07.

c) Operational Restrictions

(1) The permittee shall meet the following work practice standards:

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

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

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

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-21-25 and 40 CFR Part 63, Subpart WWWW]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records for each emissions unit:

a. the company identification for each resin mix;

b. tons of each resin mix produced;

c. the weight percent of available organic HAP (e.g., styrene, vinyl toluene and/or methyl methacrylate) for each resin mix produced; and

d. the total VOC emission rate for all resin mix produced, as calculated by the following equation, in pounds per month:

$$\text{VOC}\left(\frac{\text{lbs}}{\text{month}}\right) = \sum_{i}^{n} \text{available organic HAP x EF}$$

where:

i = tons of available organic HAP in each resin mix produced;

n = number of resin mix produced; and

EF = each emissions factor.

EF = 0.584 lb of VOC emissions emitted / ton of available orgainic HAP input

0.000292 lb of VOC emissions emitted / lb of available organic HAP input x 2000 as determined from emissions testing for P012, conducted on June 11, 1998.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(2) The permittee shall inspect each mixer when resin is present in the mixing vessel, and record the following information:

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

b. the date and all times the mixer cover was not closed over the mixing vessel, when actual mixing is occurring, except when adding materials or changing covers to the mixing vessel;

c. the date and all times the mixer vents were not closed over the mixing vessel, when actual mixing is occurring, except that venting is allowed during additions of materials, or as necessary prior to adding materials or opening the cover for safety; and

d. the date and all times when visible gaps were present in the mixer cover, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation when the mixer cover was properly employed.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each month when the VOC emissions exceeded the pounds per month limit for each emissions unit in b)(2)a, and the actual VOC emissions for each emissions unit for each such month.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(2) The permittee must submit semiannual compliance reports:

a. if there are no deviations from the work practice standards in c)(1)a – c)(1)c, provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., (1) used mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch were permissible around mixer shafts and any required instrumentation; (2) closed any mixer vents when actual mixing was occurring, except that venting was allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and (3) kept the mixer covers closed while actual mixing was occurring except when adding materials or changing covers to the mixing vessels.); and

b. if there were deviations with the work practice standards in c)(1)a – c)(1)c, provide the total operating time of the emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25, 40 CFR Part 63, Subpart WWWW and PTI P0105804]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>

EU ID	Equipment Description	lbs VOC/month	TPY VOC
P010	Thermoplastic additive disperser C-O	833	5.0
P011	Thickener disperser C-1	833	5.0

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) of these terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

g) Miscellaneous Requirements

(1) None.

8. Emissions Unit Group - Mixers II: P012, P013, P014, P015, P016, P017, P018, P021, P022, P023, P024, P025, P026, P027, P028, P099, P100,

EU ID	Operations, Property and/or Equipment Description
P012	Resin paste disperser C-2
P013	Resin paste disperser C-3
P014	Resin paste disperser C-4
P015	Resin paste disperser C-5
P016	Resin paste disperser C-6
P017	Resin paste disperser C-7
P018	Resin paste disperser C-8
P021	BMC mixer 1
P022	BMC mixer 2
P023	BMC mixer 3
P024	BMC mixer 4
P025	BMC mixer 5
P026	BMC mixer 6
P027	BMC continuous mixer 1 & 2
P028	Two pilot plant dispersers for BMC
P099	BMC mixer 7
P100	Readco BMC mixer

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) b)(1)c and b)(1)d.

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 3745-31-05(D)	See B.2: facility-wide limit for volatile organic compounds (VOC) emissions.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	VOC emissions shall not exceed the lbs/month and tpy emission limitations specified in b)(2)a. See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)c.
d.	OAC rule 3745-31-05(E) effective 12/01/06	See b)(2)d and b)(2)e.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-11	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(E).
f.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
g.	OAC rule 3745-21-25 OAC rule 3745-21-25 will be federally effective as of August 12, 2011.	Work practice standards in Table 1 of OAC rule 3745-21-25. See c)(1) and b)(2)f.
h.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(1).
i.	40 CFR Part 63.1 through 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

a. VOC emissions shall not exceed the lbs/month and tpy emission limitations specified below:

EU ID	Equipment Description	lbs VOC/month	TPY VOC
P012	Resin paste disperser C-2	667	4.0
P013	Resin paste disperser C-3	667	4.0
P014	Resin paste disperser C-4	667	4.0
P015	Resin paste disperser C-5	667	4.0
P016	Resin paste disperser C-6	333	2.0
P017	Resin paste disperser C-7	333	2.0
P018	Resin paste disperser C-8	333	2.0
P021	BMC Sigma mixer 1	1650	9.9
P022	BMC mixer 2	1650	9.9
P023	BMC mixer 3	1650	9.9
P024	BMC mixer 4	1650	9.9
P025	BMC mixer 5	833	5.0
P026	BMC mixer 6	833	5.0
P027	BMC continuous mixer 1 & 2	833	5.0
P028	Two pilot plant dispersers for BMC	166	1.0
P099	BMC mixer 7	166	1.0
P100	Readco BMC Mixer	833	5.0

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limitations/control measures no longer apply.

c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/year.

d. Permit to Install P0105804 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A(3):

i. use baghouse to control particulate emissions; and

ii. particulate emissions (PE) shall not exceed 0.01 gr/dscf from the exhaust of the stack from the baghouse.

e. The emissions from the emissions units listed above shall be vented to the baghouse when one or more of the emissions units are in operation.

f. In accordance with paragraph (A)(3) of OAC rule 3745-21-25, upon achieving compliance with this rule, the reinforced plastic composites production operations at the facility are not required to meet the requirements of OAC rule 3745-21-07.

c) Operational Restrictions

(1) The permittee shall meet the following work practice standards:

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

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

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

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-21-25 and 40 CFR Part 63, Subpart WWWW]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records for each emissions unit:

a. the company identification for each resin mix;

b. tons of each resin mix produced;

c. the weight percent of available organic HAP (e.g., styrene, vinyl toluene and/or methyl methacrylate) for each resin mix produced; and

d. the total VOC emission rate for all resin mix produced, as calculated by the following equation, in pounds per month:

$$\text{VOC}\left(\frac{\text{lbs}}{\text{month}}\right) = \sum_{i}^{n} \text{available organic HAP x EF}$$

where:

i = tons of available organic HAP in each resin mix produced;

n = number of resin mix produced; and

EF = each emissions factor.

EF = 0.584 lb of VOC emissions emitted / ton of available organic HAP input

0.000292 lb of VOC emissions emitted / lb of available organic HAP input x 2000 as determined from emissions testing for P012, conducted on June 11, 1998. Use EF for emissions units P014, P015 and P028.

EF = 25 lb of VOC emissions emitted / ton of available organic HAP input

0.0125 lb of VOC emissions emitted / lb of available organic HAP input x 2000 as determined from emissions testing for P022, conducted on September 18, 1997. Use EF for emissions units P021.

EF = 2 lb of VOC emissions emitted / ton of available organic HAP input

0.001 lb of VOC emissions emitted / lb of available organic HAP input x 2000 as determined from engineering estimates. Use EF for emissions units P025 through P027 and P099.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(2) In order to maintain compliance with the applicable emission limitations contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1 to 3 inches of water.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the pressure drop readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(4) The permittee shall inspect each mixer when resin is present in the mixing vessel, and record the following information:

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

b. the date and all times the mixer cover was not closed over the mixing vessel, when actual mixing is occurring, except when adding materials or changing covers to the mixing vessel;

c. the date and all times the mixer vents were not closed over the mixing vessel, when actual mixing is occurring, except that venting is allowed during additions of materials, or as necessary prior to adding materials or opening the cover for safety; and

d. the date and all times when visible gaps were present in the mixer cover, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation when the mixer cover was properly employed.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in a (above) where a prompt investigation was not conducted;

d. each incident of deviation described in a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in a where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each month when the VOC emissions exceeded the pounds per month limit for each emissions unit in b)(2)a, and the actual VOC emissions for each emissions unit for each such month.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(3) The permittee must submit the following semiannual compliance reports:

a. if there are no deviations from the work practice standards in c)(1)a – c)(1)c, provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., (1) used mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch were permissible around mixer shafts and any required instrumentation; (2) closed any mixer vents when actual mixing was occurring, except that venting was allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and (3) kept the mixer covers closed while actual mixing was occurring except when adding materials or changing covers to the mixing vessels.); and

b. if there were deviations with the work practice standards in c)(1)a – c)(1)c, provide the total operating time of the emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25, 40 CFR Part 63, Subpart WWWW and PTI P0105804]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

EU ID	Equipment Description	lbs VOC/month	TPY VOC
P012	Resin paste disperser C-2	667	4.0
P013	Resin paste disperser C-3	667	4.0
P014	Resin paste disperser C-4	667	4.0
P015	Resin paste disperser C-5	667	4.0
P016	Resin paste disperser C-6	333	2.0
P017	Resin paste disperser C-7	333	2.0
P018	Resin paste disperser C-8	333	2.0
P021	BMC Sigma mixer 1	1650	9.9
P022	BMC mixer 2	1650	9.9
P023	BMC mixer 3	1650	9.9
P024	BMC mixer 4	1650	9.9
P025	BMC mixer 5	833	5.0
P026	BMC mixer 6	833	5.0
P027	BMC continuous mixer 1 & 2	833	5.0
P028	Two pilot plant dispersers for BMC	166	1.0
P099	BMC mixer 7	166	1.0
P100	Readco BMC Mixer	833	5.0

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) of these terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

b. Emission Limitation:

PE shall not exceed 0.01 gr/dscf from the exhaust stack of the baghouse.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

c. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

g) Miscellaneous Requirements

(1) None.

9. Emissions Unit Group - SMC & TMC machines: P029, P030, P031,

EU ID	Operations, Property and/or Equipment Description
P029	Thick mold compound (TMC) machine
P030	Sheet mold compound (SMC) machine 1
P031	Sheet mold compound (SMC) machine 2

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) b)(1)d, b)(1)e and b)(1)g.

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 3745-31-05(D)	See B.2: facility-wide limit for volatile organic compounds (VOC) emissions.
b.	OAC rule 3745-31-05(D)	An emission control system (ECS), equipped with a permanent total enclosure for each emissions unit and a regenerative thermal oxidizer (RTO), shall reduce VOC emissions from each emissions unit (P029, P030 and P031) by at least 95% by weight (i.e., an overall control efficiency of at least ninety-five per cent by weight). See b)(2)a through b)(2)d and c)(1) through c)(5).
c.	OAC rule 3745-21-07(G)(2)	a) The emission limitation required by this applicable rule is less stringent than the emission limitation in b)(1)b established pursuant to OAC rule 3745-31-05(D). b) c) See b)(2)e.

d.	OAC rules 3745-21-07(M)(2), 3745-21-07(M)(3)(a) and 3745-21-07(M)(3)(b)	t subject to rules per OAC rules 3745-21-07(M)(3)(c)(iii). missions units P029, P030 and P031 are subject to and complying with the best available technology requirements in b)(1)b, pursuant to OAC rule 3745-31-05 that specifies an overall control efficiency for VOC emissions that is greater than eighty-five per cent, by weight.
e.	OAC rule 3745-21-07(M)(3)(g)	The provisions of paragraph (M)(3)(g) of OAC rule 3745-21-07 shall not apply to emissions units P029, P030, and P031, when complying with all work practice standards as specified in OAC rule 3745-21-07(M)(5)(h). See c)(6).
f.	OAC rule 3745-21-25 OAC rule 3745-21-25 will be federally effective as of August 12, 2011.	Work practice standards in Table 1 of OAC rule 3745-21-25. See c)(6) and b)(2)f.
g.	OAC rules 3745-21-25(D)(8), 3745-21-25(D)(9) and 3745-21-25(D)(10)	These rules shall not apply to emissions units P029, P030 and P031 because they are controlled by the ECS.
h.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(6).
i.	40 CFR Part 63.1 through 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

a. A permanent total enclosure shall be constructed to totally enclose each emissions unit such that all VOC emissions are captured, contained, and directed to the RTO. Each permanent total enclosure shall be designed to meet the requirements of U.S. EPA Reference Method 204 in 40 CFR Part 51, Appendix M.

b. Each permanent total enclosure shall be maintained under negative pressure whenever an emissions unit is in operation, and shall be designed and maintained to have an average facial velocity of air through each natural draft opening of at least 200 feet per minute (3,600 m/hr). Compliance with the average facial velocity shall be demonstrated during the compliance test, by

either using an air flow monitor or a differential pressure gauge at each natural draft opening, and maintaining the required facial velocity or the corresponding negative pressure. Each permanent total enclosure shall meet all of the following criteria if the capture efficiency of the enclosure and control device is to be assumed to be 100%:

i. Any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point. An equivalent diameter is the diameter of a circle that has the same area as the opening. If the opening is not circular the equivalent diameter (ED) is calculated as follows:

$$ED = (4\ area/\pi)^{0.5}$$

ii. The total area of all natural draft openings (A_N) shall not exceed 5 percent of the total surface area of the enclosure (A_T), i.e., the four walls, floor, and ceiling. The natural draft opening to enclosure area ratio (NEAR) is calculated as follows:

$$NEAR = A_N / A_T$$

iii. The direction of air flow through all natural draft openings shall be into the enclosure, with an average facial velocity of no less than 200 feet per minute (3,600 m/hr) or a pressure drop of 0.013 mm Hg (0.007 in. H2O).

iv. All access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination in b)(2)b, shall be completely closed to any air movement during process operations.

v. All VOC emissions shall be captured and contained for discharge through the RTO.

c. Each permanent total enclosure serving an emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR, Part 51, Appendix M, Reference Method 204, and shall capture all of the VOC emissions from each emissions unit.

d. All of the VOC emissions from each emissions unit shall be vented to the RTO that shall meet the operational, monitoring, and record keeping requirements of this permit, when any emissions unit is in operation.

e. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)c.

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S. EPA approves the rule revision: b)(1)d and b)(1)e.

f. In accordance with paragraph (A)(3) of OAC rule 3745-21-25, upon achieving compliance with this rule, the reinforced plastic composites production operations at the facility are not required to meet the requirements of OAC rule 3745-21-07.

c) Operational Restrictions

(1) Natural Draft Opening:

Each permanent total enclosure shall be maintained under negative pressure, with an average facial velocity at each natural draft opening of 200 feet per minute (3,600 m/hr) or greater, whenever any emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0105804]

(2) Natural Draft Opening:

Each permanent total enclosure shall be maintained under negative pressure whenever any emissions unit is in operation. Negative pressure shall be visually monitored using streamers, plastic flow indicating strips, string, or other visually noticeable flow indicating device that shows the direction of air flow through each natural draft opening to be into the enclosure.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0105804]

(3) Control System Parameter:

In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable combustion temperature within the RTO, during any period of time when any emissions unit controlled by the RTO is in operation, shall not be less than 1,500 degrees Fahrenheit as a rolling, 3-hour average.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0105804]

(4) Control System Parameter:

In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range of hertz of the fan to maintain flow to the RTO, during any period of time when any emissions unit controlled by the RTO is in operation, shall be between 35 to 55 hertz as a rolling, 3-hour average.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0105804]

(5) Control System Parameter:

In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop at the inlet of the RTO (fan inlet pressure) during any period of time when any emissions unit controlled by the RTO is in operation, shall be between -3.5 to -5.5 inches of water as a rolling, 3-hour average.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0105804]

(6) The permittee shall meet the following work practice standards:

a. The resin delivery system to the doctor box on the sheet molding compound manufacturing machine must be closed or covered (the doctor box itself may be open). A doctor box is defined as the box or trough on a sheet molding compound manufacturing machine into which the liquid resin paste is delivered before it is metered onto the carrier film.; and

b. A nylon containing film must be used to enclose the sheet molding compound.

d) [Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-21-07(M), OAC rule 3745-21-25 and 40 CFR Part 63, Subpart WWWW]Monitoring and/or Recordkeeping Requirements

(1) Permanent total enclosure design criteria:

The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):

a. the measured diameter of each natural draft opening;

b. the distance measured from each natural draft opening to each VOC emitting point;

c. the total calculated surface area of all natural draft openings and the surface area of the enclosure's four walls, floor, and ceiling;

d. the calculation or demonstration that the distance from each VOC emitting point to each natural draft opening is at least 4 times the diameter of the opening; and

e. the calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor, and ceiling.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(2) Daily and weekly monitoring of permanent total enclosures:

The permittee shall perform daily inspections, within 30-minutes of beginning operation of any emissions unit, of the permanent total enclosure to ensure that all access doors and windows that are not natural draft openings are closed, and that the direction of air

at each natural draft opening is inward, as shown by streamers, smoke tubes, tracer gases, and/or other air flow monitoring devices.

Using a portable air flow meter, the permittee shall perform weekly facial velocity checks at each natural draft opening to the permanent total enclosure, to determine if the average facial velocity at each opening is maintained at 200 feet per minute or greater.

Records shall be maintained of the results of each daily inspection and the weekly air velocity measurements, and shall include any corrective actions taken by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(3) Continuous monitoring of temperature of RTO:

The permittee shall properly install, operate, and maintain continuous temperature monitors and recorder(s) that measure and record(s) the combustion temperature within the RTO when any emissions unit P029, P030, or P031 (TMC, SMC 01, or SMC02) is in operation, including periods of startup and shutdown. The permittee shall record the combustion temperature on a continuous basis.

The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The permittee shall maintain records relating to calibration, operation and maintenance of monitoring equipment.

All records shall be maintained at the facility for a period of no less than 5 years.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(4) Continuous monitoring of RTO fan:

The permittee shall properly install, operate, and maintain a device that continuously monitors and records the hertz, on a rolling, 3-hour average basis, of the fan used to control flow to the RTO when any emissions unit P029, P030, or P031 (TMC, SMC 01, or SMC02) is in operation. The permittee shall record the hertz on a continuous basis.

The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The permittee shall maintain records relating to calibration, operation and maintenance of monitoring equipment.

All records shall be maintained at the facility for a period of no less than 5 years.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(5) Continuous monitoring of pressure at RTO inlet:

The permittee shall properly install, operate, and maintain a device that continuously monitors and records, on a rolling, 3-hour average basis, the pressure drop at the inlet of

the RTO when any emissions units P029, P030, or P031 (TMC, SMC 01, or SMC02) is in operation. The permittee shall record the pressure drop on a continuous basis.

The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The permittee shall maintain records relating to calibration, operation and maintenance of monitoring equipment.

The monitoring equipment shall be equipped with an alarm. In the event the pressure at the inlet of the RTO is less than 3.5 inches of water or greater than 5.5 inches of water as a rolling 3-hour average, the monitoring device shall trigger its alarm.

All records shall be maintained at the facility for a period of no less than 5 years.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(6) Monthly controlled and uncontrolled VOC emissions monitoring:

The permittee shall maintain the following monthly records for each emissions unit:

a. hours of operation; and

b. the total VOC emission rates for all SMC/TMC produced, as calculated by the following equations, in pounds per month:

$$\text{VOC}\left(\frac{\text{lbs}}{\text{month}}\right) = \text{hours of operation x ER x}(1 - \text{CE}), \text{ controlled}$$

where:

CE = control efficiency of 0.9720 as determined from emissions testing for P030, conducted on November 5-6, 2009; or use most current CE as determined from emissions testing.

P029 TMC ER = emission rate of 26.88 lbs VOC/hr, which is equivalent to 26.88 lbs OC/hr (33 lb VOC/ ton of available HAP), as determined from emissions testing for P029, conducted on July 27, 2006; or use most current ER as determined from emissions testing.

P030 SMC01 ER = emission rate of 3.76 lbs VOC/hr, which is equivalent to 3.76 lbs OC/hr (6.28 lb VOC/ ton of available HAP), as determined from emissions testing for P030, conducted on December 11, 2006; or use most current ER as determined from emissions testing.

P031 SMC02 ER = emission rate of 5.77 lbs VOC/hr, which is equivalent to 5.77 lbs OC/hr, as determined from the ANSI standard for the production of SMC:

ER = 0.1457 At - 0.1454

where:

ER = VOC emission rate, lb/hr, when paste is on the line;

At = Total wet area of SMC machine = Adl + Adu + W*(Ll+Lu);

Adl = open area of the lower doctor box, ft2;

Adu = open area of the upper doctor box, ft2;

W = wet width of SMC, ft2;

Ll = Lower wet length, ft; and

Lu = Upper wet length, ft.

If emissions testing is required, use most current ER as determined from emissions testing instead of the ANSI emissions factor of 5.77 lbs VOC /hr.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(7) Monthly uncontrolled VOC emissions monitoring:

The permittee shall maintain the following monthly records for each emissions unit:

a. the amount of SMC/TMC produced for each type of SMC/TMC product; and

b. the monomer content of each SMC/TMC product.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

(8) Work practice standards monitoring:

The permittee shall inspect each emissions unit when resin is present in the resin delivery system, and record the following information:

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

b. the date and all times the resin delivery system to the doctor box was not closed or covered, when resin was present in the resin delivery system (the doctor box itself may be open); and

c. the date and all times when nylon containing film was not used to enclose the SMC/TMC.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

e) Reporting Requirements

(1) The permittee shall submit quarterly reports that identify the following:

a. State whether the ECS operated at all times during the reporting period when an emissions unit was also operating.

In the event that the ECS did not operate when an emissions unit was operating, include the following information with respect to each such event:

i. identify the beginning and end date for when an emissions unit operated without the ECS also operating;

ii. identify the likely cause for why the ECS did not operate;

iii. explain the corrective measures taken, or to be taken, to restore operation of the ECS, limit VOC emissions during the ECS outage, and prevent such an outage from occurring again in the future; and

iv. identify each emissions unit that operated during the ECS outage and, for each such unit, identify the amount of throughput processed during the ECS outage.

b. State whether each monitoring/recording device (continuous temperature monitor and recorder, continuous monitor and recorder of RTO fan, continuous monitor and recorder of pressure at RTO inlet) operated whenever an emissions unit operated, and state whether each such device was properly calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

In the event a monitoring/recording device (i) failed to operate when an emissions unit operated or (ii) failed to be properly calibrated, operated or maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals, the permittee shall provide the following information with respect to each such event:

i. identify the beginning and end dates of the event;

ii. identify the monitoring/recording device and explain the likely cause for why it (1) failed to operate or (2) failed to be calibrated, operated or maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals; and

iii. explain the corrective measures taken, or to be taken, to restore operation of the device and ensure that it is calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals.

c. State whether the permittee complied with each Control System Parameter in c)(3), c)(4) and c)(5) of this permit.

In the event that the permittee did not comply with a Control System Parameter, the permittee shall provide the following information with respect to each such event:

i. identify the beginning and end dates of the event;

ii. identify the Control System Parameter and the lowest recorded measurement for each day during the non-compliance;

iii. explain the likely cause for the non-compliance;

iv. explain the corrective measures taken, or to be taken, to restore compliance with the Control System Parameter, limit VOC emissions during the period of non-compliance, and ensure that such non-compliance does not occur in the future; and

v. identify each emissions unit that operated during the period of non-compliance and, for each such unit, identify throughput processed during the period of non-compliance.

d. State whether the daily inspections of each permanent total enclosure showed that (1) access doors and windows (not including Natural Draft Openings) were closed during the operation of an emissions unit and (2) that the direction of air flow at each Natural Draft Opening was inward.

In the event that the inspections showed that (1) an access door or window (not including Natural Draft Openings) was left open on a permanent total enclosure during the operation of an emissions unit or (2) that air flow was not moving inward at a Natural Draft Opening, permittee shall provide the following information with respect to each such event:

i. identify the date of the event;

ii. identify the emissions unit and explain the nature of the event, including an estimate of the duration of time of the event;

iii. explain the likely cause of the event; and

iv. explain the corrective measures taken, or to be taken, to correct the problem and ensure that it is not repeated in the future.

e. State whether the weekly inspections of each permanent total enclosure showed that the facial air velocity at each Natural Draft Opening was maintained at 200 feet per minute or greater when each emissions unit was operating.

In the event that an inspection showed a facial air velocity at a Natural Draft Opening was less than 200 feet per minute when an emissions unit was operating, Defendant shall provide the following information with respect to each such event:

i. identify the date of the event;

ii. identify the emissions unit involved and state the lowest air facial velocity detected during the event;

iii. explain the likely cause of the decrease in air facial velocity; and

iv. explain the corrective measures taken, or to be taken, to restore facial air velocity to 200 feet per minute (or greater) and ensure that facial air velocity does not drop below this level in the future.

The quarterly reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) 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).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(2) The permittee must submit semiannual compliance reports:

a. if there are no deviations from the work practice standards in c)(6)a and c)(6)b, provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., the resin delivery system to the doctor box was closed or covered for the reporting period and a nylon containing film was used to enclose SMC/TMC for the reporting period); and

b. if there were deviations with the work practice standards in c)(6)a and c)(6)b, provide the total operating time of the emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25, 40 CFR Part 63, Subpart WWWW and PTI P0105804]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>

100% capture of VOC emissions.

<u>Applicable Compliance Method:</u>

Compliance shall be demonstrated in accordance with the emission testing procedures specified in f)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

b. Emission Limitation:

RTO shall reduce VOC emissions from each emissions unit (P029, P030 and P031) by at least 95% by weight.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the emission testing procedures specified in f)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0105804]

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted approximately 3 years after permit issuance.

b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOCs.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable limitation(s):

i. capture efficiency of PTE: 40 CFR Part 60, Appendix A, Method 204; and

ii. control efficiency of RTO: 40 CFR Part 60, Appendix A, Method 18, 25, or 25A

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

g) Miscellaneous Requirements

(1) None.

10. Emissions Unit Group - Waste treatment units: P103, P104,

EU ID	Operations, Property and/or Equipment Description
P103	Waste Treatment Unit No. 1
P104	Waste Treatment Unit No. 2

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) b)(1)d.

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 3745-31-05(D)	See B.2: facility-wide limit for volatile organic compounds (VOC) emissions.
b.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 2.74 tons/year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(1). See b)(2)a.
c.	OAC rule 3745-21-07(G)(1)	OC emissions shall not exceed 3 lbs/hr and 15 lbs/day.
d.	OAC rule 3745-21-07(M)(4)	OC emissions shall not exceed 3 lbs/hr and 15 lbs/day.

(2) Additional Terms and Conditions

a. The following equipment standard(s) or work practice(s) shall be employed to minimize the generation of styrene emissions from this emissions unit:

i. all containers that store HAP materials must be kept closed or covered except during the addition or removal of materials; and

ii. doors and any other openings, other than makeup air inflow vents and the exhaust gas egress, shall remain closed throughout the treatment and cooling periods.

b. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)c.

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S. EPA approves the rule revision: b)(1)d.

c) Operational Restrictions

(1) No more than 1,350 lbs/day of waste, containing OCs, shall be treated in each emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-15733]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each day for each emissions unit:

a. the company identification of each container, which will contain or does contain OC waste, that shall be treated within this emissions unit;

b. the tare weight of each container, that will be employed for waste storage, in pounds;

c. the appropriate EPA hazardous waste code as listed in 40 CFR Part 261, of each waste within each container;

d. the weight of each container with untreated waste, prior to treatment, in pounds;

e. the weight of untreated waste within each container, i. e. (d) - (b), in pounds;

f. the sum total weight of untreated waste, in pounds;

g. the weight of each container with treated waste, after treatment, in pounds;

h. the weight of treated waste within each container, i. e. (g) - (b), in pounds;

i. the sum total weight of treated waste, in pounds;

j. the total OC emissions, i. e. (f) - (i), in pounds per day;

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

l. the average hourly OC emission rate, i.e. (j) divided by (k), in pounds per hour (average).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15733]

(2) Except as otherwise provided in this section, the permittee shall perform inspections of each emissions unit in accordance with the following frequencies:

a. Work practice: HAP storage containers must be kept closed or covered except during the addition or removal of materials.

Minimum inspection frequency: once per day.

b. Work practice: Doors and any other openings, other than makeup air inflow vents and the exhaust gas egress, shall remain closed throughout the treatment and cooling periods.

Minimum inspection frequency: once per day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15733]

(3) The purpose of the inspections is to ensure that equipment standard(s) or work practice(s) to minimize styrene emissions are employed. The inspections shall be performed during representative, normal operating conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15733]

(4) The permittee may, upon receipt of written approval from the Ohio EPA Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15733]

(5) The permittee shall maintain daily records of the following information for each emissions unit:

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15733]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that include the following information for each emissions unit:

a. an identification of each day during which the average hourly OC emissions exceeded 3 pounds per hour, and the actual average hourly OC emissions for each such day;

b. an identification of each day during which the OC emissions exceeded 15 pounds per day, and the actual OC emissions for each such day;

c. an identification of each day during which more than 1,350 lbs/day of total untreated waste, containing OCs, was treated within this emissions unit, and the actual, treated waste weight, in pounds;

d. an identification of each day during which an inspection was not performed at the initially required frequency as specified in d)(2) or the approved adjusted frequency as specified in d)(4); and

e. an identification of each instance when an equipment standard(s) or work practice(s) was/were not implemented.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15733]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>

OC emissions shall not exceed 3 lbs/hr.

<u>Applicable Compliance Method:</u>

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) of these terms and conditions for each emissions unit.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 18, 25, 25A, or other approved methods as appropriate.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15733]

b. <u>Emission Limitation:</u>

OC emissions shall not exceed 15 lbs/day.

<u>Applicable Compliance Method:</u>

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) of these terms and conditions for each emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15733]

c. Emission Limitation:

OC emissions shall not exceed 2.74 tons/year.

Applicable Compliance Method:

Compliance shall be based on the summation of the daily OC emission rates, in lbs/day, as calculated in d)(1) of these terms and conditions for each emissions unit for the calendar year, and then divided by 2,000 pounds/ton.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15733]

g) Miscellaneous Requirements

(1) None.