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

5/3/2012

Pamela Blakley *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.

Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: Continental Structural Plastics
Facility ID: 0388000002
Permit Type: Renewal
Permit Number: P0087970

Dear Ms. Blakley:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.ohio.gov/dapc in Microsoft Word and Adobe Acrobat format. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-3631 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA DAPC, Northwest District Office

50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

614 | 644 3020
614 | 644 3184 (fax)
www.epa.ohio.gov

Ohio | Environmental Protection Agency

PROPOSED

Division of Air Pollution Control
Title V Permit
for
Continental Structural Plastics

Facility ID:	0388000002
Permit Number:	P0087970
Permit Type:	Renewal
Issued:	5/3/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Continental Structural Plastics

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Authorization

Facility ID: 0388000002
Facility Description: Finished molded fiberglass reinforced plastic parts.
Application Number(s): A0019070, A0019071
Permit Number: P0087970
Permit Description: Title V renewal for Continental Structural Plastics - Carey Plant
Permit Type: Renewal
Issue Date: 5/3/2012
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0087969

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

Continental Structural Plastics
2915 County Road 96
Carey, OH 43316

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

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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, Northwest 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, Northwest 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.

(1) 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: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

(2) 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

(3) 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.

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

(4) 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 RequirementsUnder 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.)

25. Records Retention RequirementsUnder 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.

26. 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))

27. 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).

28. 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))

29. 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) None.

2. The following rule is applicable to this facility: 40 CFR 63.4480 et seq. (Subpart PPPP)

   The permittee shall comply with the applicable emission limitation of 40 CFR 63 Subpart PPPP as set forth in B.4 and B.5.

3. The following is the list of the emissions units at this facility that are 'existing affected sources' subject to 40 CFR 63.4480 et seq. (Subpart PPPP):

   a) significant emissions units R009;

   b) insignificant emissions unit R010; and

   c) all other 'affected sources' (existing or new) at the facility, as defined in 40 CFR 63.4482(b).

4. The options for compliance when using more than one type of coating is described in 40 CFR 63.4490(c). In accordance with this rule, the permittee may meet the emissions limit of each coating type individually, or may calculate a facility specific emissions limit. The permittee is required to maintain documentation as required by 63.4530(c), and submit reports demonstrating compliance, as required in 63.4520.

5. The permittee has elected to use the compliance option provided by 40 CFR 63.4491(a) - compliant material option. This is accomplished by demonstrating that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in 40 CFR 63.4490, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee must meet all the requirements of 40 CFR 63.4540, 63.4541, and 63.4542 to demonstrate compliance with the applicable emission limit using this option.

   The permittee may use any of the three compliance options [63.4491(a), (b), or (c)], as described in 63.4491; however, the permittee must meet all of the requirements of each option when it is used. [See 40 CFR 63.4480-4581.]

6. In conjunction with B.2, B.3, B.4, and B.5, the permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR 63 Subpart PPPP, including the following sections:

Subpart PPPP section	**Subpart PPPP requirement**
63.4530	Requirement to keep data and information specified.
63.4531	Format for records and length of time to keep records.

[OAC rule 3745-77-07(C)(1), and 40 CFR Part 63, Subpart PPPP]

7. In conjunction with B.2, B.3, B.4, and B.5, the permittee shall comply with the applicable reporting requirements required under 40 CFR 63 Subpart PPPP, including the following sections:

Subpart PPPP section	Subpart PPPP requirement
63.4530	Requirement to keep data and information specified.
63.4531	Format for records and length of time to keep records.

[OAC rule 3745-77-07(C)(1), and 40 CFR Part 63, Subpart PPPP]

8. In conjunction with B.2, B.3, B.4, and B.5, the permittee shall comply with the applicable compliance requirements as required under 40 CFR 63 Subpart PPPP, including sections 63.4491, and 63.4540 through 63.4568.

[OAC rule 3745-77-07(C)(1), and 40 CFR 63 Subpart PPPP]

9. In conjunction with B.2, B.3, B.4, and B.5, the permittee shall comply with the following miscellaneous requirements: Table 2 to Subpart PPPP of 40 CFR Part 63 – Applicability of General Provisions to Subpart PPPP shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

[OAC rule 3745-77-07(C)(1), and 40 CFR 63 Subpart PPPP]

10. The emissions unit(s) contained in B.3 are subject to 40 CFR, Part 63, Subpart PPPP. 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://www.ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

[OAC rule 3745-77-07(C)(1), and 40 CFR 63 Subpart PPPP]

11. The following emissions units contained in this permit are subject to 40 CFR, Part 63, Subpart WWWW: P008 through P022, P033, P034, and P036 through P042. 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://www.ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

[OAC rule 3745-77-07(C)(1), and 40 CFR 63 Subpart WWWW]

12. The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart DDDDD, in accordance with 40 CFR Parts 63.7480 through 63.7575 (including the Table(s) and Appendix(ices) referenced in Subpart DDDDD).

The following emissions units in this permit are subject to the aforementioned requirements: B012, B022 and B023.

[Authority for term: OAC rule 3745-77-07(A)(13), 40 CFR Part 63, Subpart DDDDD]

13. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, and 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, 40 CFR Part 63, Subpart PPPP and/or 40 CFR Part 63, Subpart DDDDD:

a) B010 – 7 Gas Fired Space Heaters
b) B012 - Boiler #4 (natural gas/propane back-up) – 9.656 MMBtu/hr input
c) B013 – Air Make Up #1 – 5.6 MMBtu/hr input (West Cafeteria)
d) B014 - Air Make Up #2 – 3.2 MMBtu/hr input (West Break Area)
e) B015 - Air Make Up #3 – 2.4 MMBtu/hr input (West Break Area)
f) B016 - Air Make Up #4 – 10.0 MMBtu/hr input (East Wall Between Presses 8 & 9)
g) B017 - Air Make Up #5 – 3.575 MMBtu/hr input (West Building Maintenance Area)
h) B018 - Air Make Up #6 - 10 MMBtu/hr input (East Wall Between Presses 12 & 14)
i) B019 - Air Make Up #7 - 5.0 MMBtu/hr input (East Wall East Building)
j) B020 - Air Make Up #8 – 7.975 MMBtu/hr input (New Paint West End North Wall)
k) B021 - Air Make Up #9 – 5.6 MMBtu/hr input (New Paint East End)
l) B022 – Boiler #1 (natural gas/propane back-up) – 8.475 MMBtu/hr input
m) B023 – Boiler #2 (natural gas/propane back-up) – 8.475MMBtu/hr input
n) B024- Air Make Up #10 – 4.55 MMBtu/hr input (EMS Accum Lanes in East Building)
o) B025 – Air Make Up #11 – 5.6 MMBtu/hr input (GMT Bonding in East Building)
p) B026 - Air Make Up #12 – 5.6 MMBtu/hr input (Press #23)
q) P044 - Blasdell Oven
r) P046 - Parts Washer #2-heated plastic parts washer
s) P047 - Dry Off Oven #2 Primer system dry off oven
t) R010 - Facility-wide Paint Touch up Areas

[OAC rule 3745-77-07(A)(13)]

C. Emissions Unit Terms and Conditions

1. P901, Secondary Finishing Operations

Operations, Property and/or Equipment Description:

Secondary finishing operations of 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) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 03-13649 issued April 10, 2007)	0.87 lb particulate emissions (PE)/hour, 3.82 tons PE/yr [from the baghouse stacks] 5.96 tons fugitive PE/yr See b)(2)a., b)(2)b., b)(2)c. and b)(2)d.
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule [from the baghouse stacks]
c.	OAC rule 3745-17-11(B)(1)	See b)(2)e.
d.	OAC rule 3745-17-07(B)(1)	Fugitive visible PE shall not exceed 20 percent opacity, as a three-minute average.
e.	OAC rule 3745-17-08(B)	See b)(2)e.

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

b. Best available technology (BAT) for this emission unit has been determined to be use of baghouses with a maximum outlet concentration of 0.004 gr/dscf and use of best available control measures for fugitive dust control.

c. The permittee shall employ best available control measures on all PE from secondary finishing operations not captured and controlled by a

baghousesystem, for the purpose of ensuring compliance with the above mentioned applicable requirements. Secondary finishing operations shall be contained within the facility building (enclosure control) to ensure compliance.

d. All PE from the baghouse stacks are assumed to be particulate matter less than ten microns (PM_{10}).

e. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouses and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer is not required to document the exact start and end times for the visible emission incident under item d)(1)d. above or continue the opacity readings until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were in compliance with OAC rule 3745-17-07(B)(1) and representative of normal operations, specify the corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI 03-13649]

(2) Notwithstanding the frequency of the monitoring requirements specified in d)(1), the permittee may reduce the frequency of visual observations of visible particulate emissions required in d)(1) from weekly to monthly readings, if for one full quarter the

facility's visual observations indicate no abnormal visible fugitive particulate emissions from the egress points associated with this emissions unit. The permittee shall revert to weekly readings for d)(1), as applicable, if any abnormal visible particulate emissions from the associated egress points are observed.

[OAC rule 3745-77-07(C)(1)]

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-13649, issued on 04/10/2007: **[d)(2)]**. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;

b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and

c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07 (C)(1) and PTI 03-13649]

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

[OAC rule 3745-15-03(A)]

f) Testing Requirements

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

a. Emission Limitations: 0.87 lb PE/hour and 3.82 tons PE/year(stack)

Applicable compliance Method: PE will be controlled by five baghouse systems. The emissions from the five baghouse stacks will result in a combined emission of 0.87 lb PE/hour as determined in accordance with the following:

PE(baghouse Stack)=(SZA)+(SZB)+(SZC)+(SZD)+(SZE)

SZA=PE from Spencer Zone A baghouse system

SZA =(0.004 gr/dscf)(8000 dscf/min)(60 min/hr)(1 lb/7000 gr)

SZA=0.27 lb/hr

SZB=PE from Spencer Zone B baghouse system

SZB=(0.004 gr/dscf)(4500 dscf/min)(60 min/hr)(1lb/7000 gr)

SZB=0.15 lb/hr

SZC PE from Spencer Zone C baghouse system

SZC=(0.004 gr/dscf)(4500 dscf/min)(60 min/hr)(1 lb/7000 gr)

SZC=0.15 lb/hr

SZD=PE from Spencer Zone D baghouse system

SZD=(0.004 gr/dscf)(4500 dscf/min)(60 min/hr)(1lb/7000 gr)

SZD=0.15 lb/hr

SZE=PE from Spencer Zone E baghouse system

SZE=(0.004 gr/dscf)(4500 dscf/min)(60 min/hr)(1lb/7000 gr)

SZE=0.15 lb/hr

If required the permittee shall demonstrate compliance with the hourly allowable PE limitations pursuant to Methods 1 – 5 of 40 CFR, Part 60, Appendix A.

The annual limitation was developed by multiplying the hourly limitation by 8760 hour per year and dividing by 2000 lbs per ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI 03-13649]

b. Emission Limitation: 5.96 tons PE/year (fugitive)

Applicable Compliance Method: Fugitive particulate emissions are exhaust through the ventilation system of the building containing the secondary finishing operations. The company supplied emissions factor of 3.14 x 10^{-8}lb PE/ft^3 was derived from actual testing of the air in the secondary finishing operations building. The emission limitation was developed using the company supplied emission factor, a maximum volumetric flow rate of 43,366,500 ft^3 per hour from the building ventilation system, a maximum operating schedule of 8760 hours per year, and dividing by 2000 lbs per ton.

[OAC rule 3745-77-07 (C)(1) and PTI 03-13649]

c. Emission Limitation: Visible PE shall not exceed 20% opacity, as a six minute average, except as provided by rule. (from the baghouse stacks)

Applicable Compliance Method: If required compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC 3745-17-03(B)(1).

[OAC rule 3745-77-07 (C)(1) and PTI 03-13649]

d. Emission Limitation: Fugitive visible PE shall not exceed 20% opacity, as a three minute average, except as provided by rule. (from the egress points)

Applicable Compliance Method: If required compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC 3745-17-03(B)(3).

[OAC rule 3745-77-07 (C)(1) and PTI 03-13649]

g) Miscellaneous Requirements

(1) None.

2. R009, Downdraft Main Paint Booth

Operations, Property and/or Equipment Description:

Downdraft main paint booth

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) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 03-13552 issued on July 12, 2001)	7.60 lbs particulate emissions (PE)/hour and 33.30 tons PE/yr
b.	OAC rule 3745-31-05(D) (PTI 03-13552 issued on July 12, 2001)	2.30 lbs OC/hour and 10.10 tons OC/yr from the application of coating 151.20 lbs OC/month and 0.91 ton OC/yr from the use of cleanup materials See b)(2)a. and b)(2)b.
c.	OAC rule 3745-17-07(A)	Visible PE from the stack servicing this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule
d.	OAC rule 3745-21-07(M)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
e.	40 CFR Part 63, Subpart PPPP (40 CFR 63.4480-4581) [In accordance with 40 CFR 63.4481 (a) and (b) and 40 CFR 63.4482(a), (b), and (e), this emissions unit is an existing plastic parts coating operation subject to the emissions limitations/control measures specified in Subpart PPPP. [See b)(2)d. and b)(2)e.]	The permittee shall comply with one of the four emissions limits identified in 40 CFR 63.4490 (b)(1) through (4), or comply as provided in 40 CFR 63.4490(c). [In accordance with 40 CFR 36.4490(a)(1), this emissions unit currently complies with the "general use" coating category. For each existing coating affected source, limit organic

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		hazardous air pollutant (HAP) emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.] See b)(2)c. Compliance with the standard of 63.4990 shall be demonstrated by following the applicable procedures in 63.4491 and using at least one of the three compliance options listed in paragraphs (a) through (c) of this rule. See b)(2)d.
f.	40 CFR 63.1-15 [40 CFR 63.4501]	Table 2 to Subpart PPPP of 40 CFR, Part 63 – Applicability of General Provisions to Subpart PPPP of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
g.	40 CFR, part 64 – Compliance Assurance Monitoring (CAM)	See d)(2) through d)(6), and e)(1)c.
h.	OAC rule 3745-17-11 (C)	b)(2)e.

(2) Additional Terms and Conditions

a. The permittee shall employ best available technology (BAT) control requirements on these emissions units. BAT has been determined to be the use of a regenerative thermal oxidizer which meets the requirement of OAC rule 3745-21-07(G)(2) and (G)(6) as those rules existed at the time of the PTI issuance, which are now equivalent to the requirements in OAC rule 3745-21-07(M)(2).

b. The best available technology (BAT) determination was made in accordance with a request by the permittee to voluntarily limit allowable emissions of OC to the following federally enforceable limitation:

Coating operations – 2.30 lbs OC/hr and 10.10 tons OC/yr

Cleanup operations – 151.20 lbs OC/month and 0.91 ton OC/yr

The federally enforceable limitations are based on the use of a regenerative thermal oxidizer with a destruction efficiency of 98% (100% capture).

c. The options for compliance when using more than one type of coating is described in 40 CFR 63.4490(c). In accordance with this rule, the permittee may meet the emissions limit of each coating type individually, or may calculate a

facility specific emissions limit. The permittee is required to maintain documentation as required by 63.4530(c), and submit reports demonstrating compliance, as required in 63.4520.

d. The permittee has elected to use the compliance option provided by 40 CFR 63.4491(a) - compliant material option. This is accomplished by demonstrating that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in 40 CFR 63.4490, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee must meet all the requirements of 40 CFR 63.4540, 63.4541, and 63.4542 to demonstrate compliance with the applicable emission limit using this option.

The permittee may use any of the three compliance options [63.4491(a), (b), or (c)], as described in 63.4491; however, the permittee must meet all of the requirements of each option when it is used. [See 40 CFR 63.4480-4581.]

Note: The OC capture /control system for this unit is not being used for compliance with Subpart PPPP at the time of permit processing. A performance test was conducted in June 2003 (for other rule requirements) - as of the time of permit processing, this test has not been evaluated with regard to conformance with Subpart PPPP.

e. Pursuant to OAC 3745-17-11(C)(3), these emissions units are exempt from the requirements of OAC rule 3745-17-11.

c) Operational Restrictions

(1) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)a.]:

a. the use of a regenerative thermal oxidizer with a destruction efficiency of 98% (100% capture)

[OAC rule 3745-77-07(A)(1) and PTI 03-13552]

(2) The permittee shall operate the waterwash system whenever this emissions unit is in operation.

[OAC rule 3745-77-07(A)(1) and PTI 03-13552]

(3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart PPPP, including the following sections:

Subpart PPPP section	Subpart PPPP requirement
63.4492(b)	Requirement to meet the operating limits specified in Table 1 to this subpart.
63.4493(b)	Requirement to meet the work practice standards stated in (b)(1) through (b)(5), in order to minimize organic HAP emissions.

63.4500(a)(2)	Requirement to be in compliance with the emission limitations and operating limits except during periods of startup, shutdown, and malfunction. Requirement to be in compliance with the work practice standards at all times.
63.4500(b)	Requirement to always operate and maintain the affected source in accordance with 63.6(e)(1)(i).
63.4500(c) This requirement is applicable only if the oxidizer is being used for Subpart PPPP compliance.	Requirement to develop and implement a written startup, shutdown, and malfunction plan according to the provisions of 63.6(e)(3).

[OAC rule 3745-77-07(A)(1), and 40 CFR Part 63, Subpart PPPP]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records which list the following information for each coating and cleanup material employed in emissions units R009:

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

b. the quantity of each coating and cleanup material employed, in gallons;

c. the OC content of each coating and cleanup material, in pounds/gallon, as applied;

d. the OC emissions for each coating and cleanup material employed, in tons/month, calculated as follows:

$$\sum E_n = \frac{[U_n \times V_n \times (C_n/100) \times (1-(K/100))] + [U_n \times V_n \times (1-(C_n/100))]}{2000}$$

Where:
E_n= OC emissions from an individual material (tons OC emitted/month);
U_n= Total usage of the individual material (gallons of material/month);
V_n= OC content, as applied (pounds OC/gallon);
C_n= Capture efficiency (percent);
K = Destruction efficiency as determined during the most recent performance test and maintained via parametric monitoring.

e. the total OC emission rate for all coatings and cleanup materials employed, in tons/month, calculated as follows:

$E_M = E_1 + E_2 + E_3 + ... + E_n$

Where:
E_M = Monthly OC emissions, in tons/month
E_n = OC emissions from each coating and cleanup material [i.e. d)(1)d];

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) – (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density x {1-ROT destruction efficiency from most recent performance test demonstrating unit was in compliance}.

[OAC rule 3745-77-07(C)(1) and PTI 03-13552]

(2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 64, and PTI 03-13552]

(3) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit 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/limit 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 temperature 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.

The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/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.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(4) The CAM plan for this emissions unit has been developed for volatile organic compounds. The CAM performance indicator for the thermal oxidizer controlling this emissions unit is the combustion temperature, which was established in accordance with performance testing. When the combustion temperature shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The oxidizer shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(5) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment (e.g. calibration or replacement of the thermocouple every two years). The permittee shall maintain a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(6) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(7) The permittee shall maintain daily records that document any time periods when the waterwash system was not in service when the emissions unit was in operation.

[OAC rule 3745-77-07(C)(1) and PTI 03-13552]

(8) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR, Part 63, Subpart PPPP, including the following sections:

Subpart PPPP section	Subpart PPPP requirement
63.4530	Requirement to keep data and information specified.
63.4531	Format for records and length of time to keep records.

[OAC rule 3745-77-07(C)(1), and 40 CFR Part 63, Subpart PPPP]

e) Reporting Requirements

(1) The permittee shall submit annual reports that specify the total OC emissions from the coatings and cleanup materials usages for the previous calendar year. These reports shall be submitted in accordance with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A).

[OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;

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 thermal oxidizer;

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

d. each incident of deviation described in a or “b” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in a or “b” where proper records were not maintained for the investigation and/or the corrective action(s).

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

[OAC rule 3745-77-07(C)(1), 40 CFR Part 64 and PTI 03-13552]

(3) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the waterwash system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs. The reports shall be submitted electronically through Ohio EPA Air Services.

[OAC rule 3745-77-07(C)(1) and PTI 03-13552]

(4) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart PPPP, per the following sections:

Subpart PPPP section	**Subpart PPPP requirement**
63.4510	Requirement to submit notifications, including initial notification and notification of compliance status.
63.4520	Requirement to submit semiannual compliance reports; performance test reports; and startup, shutdown, and malfunction reports.

[OAC rule 3745-77-07(C)(1), PTI 03-13903, and 40 CFR Part 63, Subpart PPPP]

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

[OAC rule 3745-15-03(A)]

(6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13552, issued on July 12, 2001: **[e)(1)]**. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

(1) 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 at least 2 years but not more than 3 years after permit issuance. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.

b. The emission testing shall be conducted to demonstrate compliance with the hourly OC limitations, capture efficiency and control efficiency limitations for OC emissions.

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

   i. pounds OC per hour: Methods 1-4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A.

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

   The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA s Guidelines for Determining Capture Efficiency, dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

   The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest 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 Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).

Personnel from the Director (the Ohio EPA, Northwest 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.

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 Director (the Ohio EPA, Northwest 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 Director (the Ohio EPA, Northwest District Office).

[OAC rule 3745-77-07(C)(1)]

(2) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

a. Emission Limitation:

10.10 tons OC/year from coating operations

Applicable Compliance Method:

Compliance with the annual OC emission limitation shall be determined based upon the record keeping requirements specified in d)(1).

[OAC rule 3745-77-07(C)(1) and PTI 03-13552]

b. Emission Limitation:

0.91 tons OC/year from cleanup operations

Applicable Compliance Method:

Compliance with the annual OC emission limitation shall be determined based upon the record keeping requirements specified in d)(1).

[OAC rule 3745-77-07(C)(1) and PTI 03-13552]

c. Emission Limitation:

2.30 pounds OC/hour from coating operations

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable OC limitation based on the results of emission testing required in f)(1) above.

(Past compliance with the hourly OC limitations was demonstrated by emission testing conducted on June 3, 2003.)

[OAC rule 3745-77-07(C)(1) and PTI 03-13552]

d. Emission Limitation:

151.20 pounds OC/month from cleanup operations

Applicable Compliance Method:

The permittee shall demonstrate compliance with the monthly allowable OC limitation based record keeping requirements in d)(1).

[OAC rule 3745-77-07(C)(1) and PTI 03-13552]

e. Emission Limitation:

7.60 pounds PE/hour and 33.30 tons PE/year

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

E = maximum coating solids usage rate in pounds per hour x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (water curtain).

If required, compliance with the hourly PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI 03-13552]

f. Emission Limitation:

destruction efficiency of 98% and capture of 100%.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the capture and control standards based on the results of emission testing.

(Past compliance was demonstrated by emission testing conducted on June 3, 2003)

[OAC rule 3745-77-07(C)(1) and PTI 03-13552]

g. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI 03-13552]

(3) Formulation data or U.S. EPA Method 24 shall be used to determine the OC content of the coatings.

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group -Compression Molding Presses (A): P008,P009,P010,P012, P016,P017,P018,P019,

EU ID	Operations, Property and/or Equipment Description
P008	Compression molding press #1
P009	Compression molding press #2
P010	Compression molding press #3
P012	Compression molding press #5
P016	Compression molding press #9
P017	Compression molding press #10
P018	Compression molding press #11
P019	Compression molding press #12

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) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 03-13557 issued on 8/28/2001)	Compression Molding (SMC) emission limitations, see b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(D) (PTI 03-13557 issued on 8/28/2001 and PTI 03-13810 issued on 9/26/2002)	SMC compression molding: 58.10 tons OC per rolling 12-month period for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined. SMC scrap generation: 28.3 tons OC per rolling 12-month period for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined. See b)(2)c. and b)(2)d.

c.	OAC rule 3745-21-25	See b)(2)e., d(3), and e)(2).
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5785 – 5935) [In accordance with 40 CFR 63.5790(b), this emissions unit is an existing "closed molding" affected source subject to the emission limitations/control requirements specified in this section.]	Standards – 40 CFR 63.5805(b) – See b)(2)f., b)(2)g., d)(4), e)(3), and f(2).
e.	40 CFR 63.1 – 15 (40 CFR 63.6013)	Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. Emissions of organic compounds (OC) from compression molding shall not exceed the following for each emissions unit individually:

Emissions unit	lbs/hr	tpy
P008	1.12	3.9
P009	2.38	6.60
P010	2.17	6.15
P012	2.03	5.85
P016	1.61	4.95
P017	1.40	4.50
P018	1.54	4.80
P019	2.87	7.65

b. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-21-25, and 40 CFR Part 63, Subpart WWWW.

c. The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions [see c)(1)] and are being established for purposes of avoiding PSD major source status. For purposes of federal enforceability, restricting OCs effectively restricts VOCs.

d. All emissions from scrap generation are fugitive.

e. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(D)(1)	VOC Work Practices
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates

f. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #1 for closed molding operation using injection /compression molding.

g. The company shall comply with (or have complied with, as applicable) the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.

Note: the Table 2 dates have passed, and the permittee had been determined to have achieved compliance accordingly.

c) Operational Restrictions

(1) The maximum annual SMC usage for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined, shall not exceed any of the following:

a. 2,000,000 lbs of preheated SMC;

b. 56,600,000 lbs of non-preheated SMC; and

c. 56,600,000 lbs of combined SMC (preheated and/or non-preheated).

The annual SMC usage restrictions shall be based upon a rolling 12-month summation of the monthly SMC input rates.

[OAC 3745-77-07(A)(1), PTI 03-13557 and PTI 03-13810]

(2) The maximum annual scrap generation for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined, shall not exceed 56,600,000 lbs per rolling, 12-month period.

[OAC 3745-77-07(A)(1), PTI 03-13557 and PTI 03-13810]

(3) Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

[OAC 3745-77-07(A)(1) and PTI 03-13557]

(4) The permittee must uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be re-covered after slitting.

[OAC rule 3745-77-07(A)(1), Table 4 to 40 CFR Part 63, Subpart WWWW, and Table 1 to OAC 3745-21-25]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to demonstrate compliance with the usage restrictions in c)(1) and the allowable OC emission limitation of 58.10 tons per rolling 12-month period (for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

a. the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;

b. the total mass of raw SMC preheated before use in all compression molding presses, in pounds;

c. the total mass of raw SMC used in all compression molding presses [d)(1)a + d)(1)b], in pounds;

d. the calculated OC emissions, in pounds or tons, using the following equations;

OC emissions (preheated) = [lbs/month, from d)(1)b] x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = [lbs/month, from d)(1)a] x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

e. the rolling 12-month summation of: the monthly SMC usage rates, in pounds, for the non-preheated [from d)(1)a]; preheated [from d)(1)b]; and total (preheated and non-preheated) [from d)(1)c] SMC usages; and the rolling 12-month summation of: the monthly OC emission rates [from d)(1)d], in tons.

*Emission factors were supplied by permittee and based on laboratory testing.

[OAC rule 3745-77-07(C)(1), PTI 03-13557 and PTI 03-13810]

(2) In order to demonstrate compliance with the usage restrictions in condition c)(2) and the allowable OC emission limitation of 28.30 tons per rolling, 12-month period (for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

a. the company identification of each type of scrap SMC generated;

b. the total mass of scrap SMC generated, in pounds;

c. the styrene content of each type of scrap SMC generated, in %, by weight;

d. the weight, in pounds, of each type of scrap SMC generated;

e. the calculated average styrene content for all the scrap SMC generated, in weight % {summation of [d)(2)c x d)(2)d], divided by d)(2)b, and multiplied by 100%} ;

f. the total mass of OC emissions generated by all molding presses [d)(2)b x d)(2)e x 0.40 volatilization factor*], in pounds; and

g. the rolling, 12-month summation of the SMC scrap generation, in pounds, and the rolling 12-month summation of the monthly OC emissions, in tons.

*Emission factor supplied by permittee and based on laboratory testing.

[OAC rule 3745-77-07(C)(1), PTI 03-13557 and PTI 03-13810]

(3) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(O)(1)	Demonstration of continuous compliance and the associated monitoring and data collection requirements
OAC rule 3745-21-25(P)(1) and (P)(4)	Record keeping requirements

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

(4) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5915(a) and (d)	Records that must be kept
63.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. any exceedances of the maximum annual SMC usage restrictions of: 2,000,000 lbs of preheated SMC; 56,600,000 of non-preheated SMC; and 56,600,000 lbs of all SMC combined (preheated and non-preheated);

b. any exceedances of the maximum annual SMC scrap generation restriction of 56,600,000 lbs; and

c. anyexceedances of the rolling 12-month OC emissions limitations of: 58.10 tons (for SMC compression molding); and 28.30 tons (for scrap generation).

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

[OAC rule 3745-77-07(C)(1), PTI 03-13557 and PTI 03-13810]

(2) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required by OAC rule 3745-21-25:

OAC rule 3745-21-25(Q)(1), (Q)(2), (Q)(3), and (Q)(5)	Reporting requirements
OAC rule 3745-21-25 (S)(1)	Requirements on applicability notification, permit application and testing notification

[OAC rule 3745-77-07 (C)(1) and OAC rule 3745-21-25]

(3) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a)–(d), (f)–(i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart WWWW]

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

[OAC rule 3745-15-03(A)]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

a. Emission Limitation:

Emissions unit	lbs OC /hr	Tpy OC
P008	1.12	3.9
P009	2.38	6.60
P010	2.17	6.15
P012	2.03	5.85
P016	1.61	4.95
P017	1.40	4.50
P018	1.54	4.80
P019	2.87	7.65

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum hourly SMC usage rates (See below) by a worst-case emission factor of 0.0035 pound of OC per pound of SMC. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

Emissions unit	maximum hourly SMC usage (lb/hr)	maximum annual SMC usage (lb/yr)	maximum annual non-preheated SMC usage (lb/yr)
P008	320	2,400,000	400,000
P009	680	5,100,000	3,100,00
P010	620	4,650,000	2,650,000
P012	580	4,350,000	2,350,000
P016	460	3,450,000	1,450,000
P017	400	3,000,000	1,000,000
P018	440	3,300,000	1,300,000
P019	820	6,150,000	4,150,000

The annual emission limitation was established by multiplying the maximum usage rate of 2,000,000 lbs of SMC/yr by the worst case emission factor of 0.0035 lb of OC/lb of SMC for preheated material, plus multiplying the maximum annual non-pre-heated SMC usage (specified above) by the emission factor of

0.002 lb of OC/lb of SMC for non-preheated SMC material. Therefore, provided compliance is shown with the operational restrictions, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI 03-13557]

b. Emission Limitation: (compression molding)
58.10 tons OC per rolling 12-month period, for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation through the record keeping required in d)(1).

[OAC rule 3745-77-07(C)(1), PTI 03-13810 and PTI 03-13557]

c. Emission Limitation: (scrap generation)
28.30 tons OC per rolling 12-month period, for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation through the record keeping required in d)(2).

[OAC rule 3745-77-07(C)(1), PTI 03-13557 and PTI 03-13810]

(2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #1 and Item #3
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group -Compression Molding Presses (B): P013, P015, P020 and P021

EU ID	Operations, Property and/or Equipment Description
P013	Compression molding press #6
P015	Compression molding press #8
P020	Compression molding press #14
P021	Compression molding press #15

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) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 03-13557 issued on 8/28/2001)	Compression Molding (SMC) 2.10 lbs organic compound (OC)/hour, 6.00 tons OC/year from each emissions unit individually. See b)(2)a.
b.	OAC rule 3745-31-05(D) (PTI 03-13557 issued on 8/28/2001 and PTI 03-13810 issued on 9/26/2002)	SMC compression molding: 58.10 tons OC per rolling 12-month period for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined. SMC scrap generation: 28.3 tons OC per rolling 12-month period for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined. See b)(2)b. and b)(2)c.

c.	OAC rule 3745-21-25	See b)(2)d., d(3), and e)(2).
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5785 – 5935) [In accordance with 40 CFR 63.5790(b), this emissions unit is an existing "closed molding" affected source subject to the emission limitations/control requirements specified in this section.]	Standards – 40 CFR 63.5805(b) – See b)(2)e., b)(2)f., d)(4), e)(3), and f(2).
e.	40 CFR 63.1 – 15 (40 CFR 63.6013)	Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-21-25, and 40 CFR Part 63, Subpart WWWW.

b. The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions [see c)(1)] and are being established for purposes of avoiding PSD major source status. For purposes of federal enforceability, restricting OCs effectively restricts VOCs.

c. All emissions from scrap generation are fugitive.

d. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(D)(1)	VOC Work Practices
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates

e. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #1 for closed molding operation using injection /compression molding.

f. The company shall comply with (or have complied with, as applicable) the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.

Note: the Table 2 dates have passed, and the permittee had been determined to have achieved compliance accordingly.

c) Operational Restrictions

(1) The maximum annual SMC usage for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined, shall not exceed any of the following:

a. 2,000,000 lbs of preheated SMC;

b. 56,600,000 lbs of non-preheated SMC; and

c. 56,600,000 lbs of combined SMC (preheated and/or non-preheated).

The annual SMC usage restrictions shall be based upon a rolling 12-month summation of the monthly SMC input rates.

[OAC 3745-77-07(A)(1), PTI 03-13557 and PTI 03-13810]

(2) The maximum annual scrap generation for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined, shall not exceed 56,600,000 lbs per rolling, 12-month period.

[OAC 3745-77-07(A)(1), PTI 03-13557 and PTI 03-13810]

(3) Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

[OAC 3745-77-07(A)(1) and PTI 03-13557]

(4) The permittee must uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be re-covered after slitting.

[OAC rule 3745-77-07(A)(1), Table 4 to 40 CFR Part 63, Subpart WWWW, and Table 1 to OAC 3745-21-25]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to demonstrate compliance with the usage restrictions in c)(1) and the allowable OC emission limitation of 58.10 tons per rolling 12-month period (for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

a. the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;

b. the total mass of raw SMC preheated before use in all compression molding presses, in pounds;

c. the total mass of raw SMC used in all compression molding presses [d)(1)a + d)(1)b], in pounds;

d. the calculated OC emissions, in pounds or tons, using the following equations;

OC emissions (preheated) = [lbs/month, from d)(1)b] x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = [lbs/month, from d)(1)a] x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

e. the rolling 12-month summation of: the monthly SMC usage rates, in pounds, for the non-preheated [from d)(1)a]; preheated [from d)(1)b]; and total (preheated and non-preheated) [from d)(1)c] SMC usages; and the rolling 12-month summation of: the monthly OC emission rates [from d)(1)d], in tons.

*Emission factors were supplied by permittee and based on laboratory testing.

[OAC rule 3745-77-07(C)(1), PTI 03-13557 and PTI 03-13810]

(2) In order to demonstrate compliance with the usage restrictions in condition c)(2) and the allowable OC emission limitation of 28.30 tons per rolling, 12-month period (for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

a. the company identification of each type of scrap SMC generated;

b. the total mass of scrap SMC generated, in pounds;

c. the styrene content of each type of scrap SMC generated, in %, by weight;

d. the weight, in pounds, of each type of scrap SMC generated;

e. the calculated average styrene content for all the scrap SMC generated, in weight % {summation of [d)(2)c x d)(2)d], divided by d)(2)b, and multiplied by 100%} ;

f. the total mass of OC emissions generated by all molding presses [d)(2)b x d)(2)e x 0.40 volatilization factor*], in pounds; and

g. the rolling, 12-month summation of the SMC scrap generation, in pounds, and the rolling 12-month summation of the monthly OC emissions, in tons.

*Emission factor supplied by permittee and based on laboratory testing.

[OAC rule 3745-77-07(C)(1), PTI 03-13557 and PTI 03-13810]

(3) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(O)(1)	Demonstration of continuous compliance and the associated monitoring and data collection requirements
OAC rule 3745-21-25(P)(1) and (P)(4)	Record keeping requirements

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

(4) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5915(a) and (d)	Records that must be kept
63.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. any exceedances of the maximum annual SMC usage restrictions of: 2,000,000 lbs of preheated SMC; 56,600,000 of non-preheated SMC; and 56,600,000 lbs of all SMC combined (preheated and non-preheated);

b. any exceedances of the maximum annual SMC scrap generation restriction of 56,600,000 lbs; and

c. anyexceedances of the rolling 12-month OC emissions limitations of: 58.10 tons (for SMC compression molding); and 28.30 tons (for scrap generation).

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

[OAC rule 3745-77-07(C)(1), PTI 03-13557 and PTI 03-13810]

(2) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required by OAC rule 3745-21-25:

OAC rule 3745-21-25(Q)(1), (Q)(2), (Q)(3), and (Q)(5)	Reporting requirements
OAC rule 3745-21-25 (S)(1)	Requirements on applicability notification, permit application and testing notification

[OAC rule 3745-77-07 (C)(1) and OAC rule 3745-21-25]

(3) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a)–(d), (f)–(i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart WWWW]

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

[OAC rule 3745-15-03(A)]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

a. <u>Emission Limitation</u>:
2.10 lbs OC per hour and 6.0 tons OC per year (compression molding)

<u>Applicable Compliance Method:</u>

The hourly OC emission limitation was established by multiplying the maximum hourly SMC usage rate of 600 lbs/hr by a worst-case emission factor of 0.0035 pound of OC per pound of SMC. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The annual emission limitation was established by multiplying the maximum usage rate of 2,000,000 lbs of SMC/yr by the worst case emission factor of 0.0035 lb of OC/lb of SMC for preheated material, plus multiplying 2,500,000 lb of SMC/yr by the emission factor of 0.002 lb of OC/lb of SMC for non-preheated material (the maximum usage rate of this emissions unit is 4,500,000 lbs of SMC/yr, of which 2,000,000 lbs of SMC/yr can be preheated.) Therefore, provided compliance is shown with the operational restrictions, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI 03-13557]

b. Emission Limitation: (compression molding)
58.10 tons OC per rolling 12-month period, for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation through the record keeping required in d)(1).

[OAC rule 3745-77-07(C)(1), PTI 03-13810 and PTI 03-13557]

c. Emission Limitation: (scrap generation)
28.30 tons OC per rolling 12-month period, for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation through the record keeping required in d)(2).

[OAC rule 3745-77-07(C)(1), PTI 03-13557 and PTI 03-13810]

(2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #1 and Item #3
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group -Compression Molding Presses (C): P014, P033, P034, P036, P037 and P038

EU ID	Operations, Property and/or Equipment Description
P014	Compression molding press #7
P033	Compression molding press #18
P034	Cmpression molding press #19
P036	Compression molding press #40
P037	Compression molding press #42
P038	Compression molding press #43

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) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 03-13557 issued on 8/28/2001)	Compression Molding (SMC): 1.75 lbs organic compound (OC)/hour, 5.25 tons OC/year from each emissions unit individually See b)(2)a.
b.	OAC rule 3745-31-05(D) (PTI 03-13557 issued on 8/28/2001 and PTI 03-13810 issued on 9/26/2002)	SMC compression molding: 58.10 tons OC per rolling 12-month period for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined. SMC scrap generation: 28.3 tons OC per rolling 12-month period for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined. See b)(2)b. and b)(2)c.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-21-25	See b)(2)d., d(3), and e)(2).
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5785 – 5935) [In accordance with 40 CFR 63.5790(b), this emissions unit is an existing "closed molding" affected source subject to the emission limitations/control requirements specified in this section.]	Standards – 40 CFR 63.5805(b) – See b)(2)e., b)(2)f., d)(4), e)(3), and f(2).
e.	40 CFR 63.1 – 15 (40 CFR 63.6013)	Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-21-25, and 40 CFR Part 63, Subpart WWWW.

b. The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions [see c)(1)] and are being established for purposes of avoiding PSD major source status. For purposes of federal enforceability, restricting OCs effectively restricts VOCs.

c. All emissions from scrap generation are fugitive.

d. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(D)(1)	VOC Work Practices
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates

e. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #1 for closed molding operation using injection /compression molding.

f. The company shall comply with (or have complied with, as applicable) the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.

Note: the Table 2 dates have passed, and the permittee had been determined to have achieved compliance accordingly.

c) Operational Restrictions

(1) The maximum annual SMC usage for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined, shall not exceed any of the following:

a. 2,000,000 lbs of preheated SMC;

b. 56,600,000 lbs of non-preheated SMC; and

c. 56,600,000 lbs of combined SMC (preheated and/or non-preheated).

The annual SMC usage restrictions shall be based upon a rolling 12-month summation of the monthly SMC input rates.

[OAC 3745-77-07(A)(1), PTI 03-13557 and PTI 03-13810]

(2) The maximum annual scrap generation for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined, shall not exceed 56,600,000 lbs per rolling, 12-month period.

[OAC 3745-77-07(A)(1), PTI 03-13557 and PTI 03-13810]

(3) Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

[OAC 3745-77-07(A)(1) and PTI 03-13557]

(4) The permittee must uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be re-covered after slitting.

[OAC rule 3745-77-07(A)(1), Table 4 to 40 CFR Part 63, Subpart WWWW, and Table 1 to OAC 3745-21-25]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to demonstrate compliance with the usage restrictions in c)(1) and the allowable OC emission limitation of 58.10 tons per rolling 12-month period (for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

a. the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;

b. the total mass of raw SMC preheated before use in all compression molding presses, in pounds;

c. the total mass of raw SMC used in all compression molding presses [d)(1)a + d)(1)b], in pounds;

d. the calculated OC emissions, in pounds or tons, using the following equations;

OC emissions (preheated) = [lbs/month, from d)(1)b] x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = [lbs/month, from d)(1)a] x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

e. the rolling 12-month summation of: the monthly SMC usage rates, in pounds, for the non-preheated [from d)(1)a]; preheated [from d)(1)b]; and total (preheated and non-preheated) [from d)(1)c] SMC usages; and the rolling 12-month summation of: the monthly OC emission rates [from d)(1)d], in tons.

*Emission factors were supplied by permittee and based on laboratory testing.

[OAC rule 3745-77-07(C)(1), PTI 03-13557 and PTI 03-13810]

(2) In order to demonstrate compliance with the usage restrictions in condition c)(2) and the allowable OC emission limitation of 28.30 tons per rolling, 12-month period (for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

a. the company identification of each type of scrap SMC generated;

b. the total mass of scrap SMC generated, in pounds;

c. the styrene content of each type of scrap SMC generated, in %, by weight;

d. the weight, in pounds, of each type of scrap SMC generated;

e. the calculated average styrene content for all the scrap SMC generated, in weight % {summation of [d)(2)c x d)(2)d], divided by d)(2)b, and multiplied by 100%} ;

f. the total mass of OC emissions generated by all molding presses [d)(2)b x d)(2)e x 0.40 volatilization factor*], in pounds; and

g. the rolling 12-month summation of the SMC scrap generation, in pounds, and the rolling 12-month summation of the monthly OC emissions, in tons.

*Emission factor supplied by permittee and based on laboratory testing.

[OAC rule 3745-77-07(C)(1), PTI 03-13557 and PTI 03-13810]

(3) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(O)(1)	Demonstration of continuous compliance and the associated monitoring and data collection requirements
OAC rule 3745-21-25(P)(1) and (P)(4)	Record keeping requirements

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

(4) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5915(a) and (d)	Records that must be kept
63.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. any exceedances of the maximum annual SMC usage restrictions of: 2,000,000 lbs of preheated SMC; 56,600,000 of non-preheated SMC; and 56,600,000 lbs of all SMC combined (preheated and non-preheated);

b. any exceedances of the maximum annual SMC scrap generation restriction of 56,600,000 lbs; and

c. anyexceedances of the rolling 12-month OC emissions limitations of: 58.10 tons (for SMC compression molding); and 28.30 tons (for scrap generation).

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

[OAC rule 3745-77-07(C)(1), PTI 03-13557 and PTI 03-13810]

(2) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required by OAC rule 3745-21-25:

OAC rule 3745-21-25(Q)(1), (Q)(2), (Q)(3), and (Q)(5)	Reporting requirements
OAC rule 3745-21-25 (S)(1)	Requirements on applicability notification, permit application and testing notification

[OAC rule 3745-77-07 (C)(1) and OAC rule 3745-21-25]

(3) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a)–(d), (f)–(i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart WWWW]

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

[OAC rule 3745-15-03(A)]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

a. <u>Emission Limitation</u>:
1.75 lbs OC per hour and 5.25 tons OC per year (compression molding)

<u>Applicable Compliance Method:</u>

The hourly OC emission limitation was established by multiplying the maximum hourly SMC usage rate of 500 lbs/hr by a worst-case emission factor of 0.0035 pound of OC per pound of SMC. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The annual emission limitation was established by multiplying the maximum usage rate of 2,000,000 lbs of SMC/yr by the worst case emission factor of 0.0035 lb of OC/lb of SMC for preheated material, plus multiplying 1,750,000 lb of SMC/yr by the emission factor of 0.002 lb of OC/lb of SMC for non-preheated material (the maximum usage rate of this emissions unit is 3,750,000 lbs of SMC/yr, of which 2,000,000 lbs of SMC/yr can be preheated.) Therefore, provided compliance is shown with the operational restrictions, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI 03-13557]

b. Emission Limitation: (compression molding)
58.10 tons OC per rolling 12-month period, for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation through the record keeping required in d)(1).

[OAC rule 3745-77-07(C)(1), PTI 03-13810 and PTI 03-13557]

c. Emission Limitation: (scrap generation)
28.30 tons OC per rolling 12-month period, for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation through the record keeping required in d)(2).

[OAC rule 3745-77-07(C)(1), PTI 03-13557 and PTI 03-13810]

(2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #1 and Item #3
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

(1) None.

6. Emissions Unit Group -Compression Molding Presses (D): P011 and P022

EU ID	Operations, Property and/or Equipment Description
P011	Compression molding press #4
P022	Compression molding press #21

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) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 03-13557 issued on 8/28/2001)	Compression Molding (SMC): 1.05 lbs organic compound (OC)/hour, 3.75 tons OC/year from each emissions unit individually See b)(2)a.
b.	OAC rule 3745-31-05(D) (PTI 03-13557 issued on 8/28/2001 and PTI 03-13810 issued on 9/26/2002)	SMC compression molding: 58.10 tons OC per rolling 12-month period for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined. SMC scrap generation: 28.3 tons OC per rolling 12-month period for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined. See b)(2)b. and b)(2)c.

c.	OAC rule 3745-21-25	See b)(2)d., d(3), and e)(2).
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5785 – 5935) [In accordance with 40 CFR 63.5790(b), this emissions unit is an existing "closed molding" affected source subject to the emission limitations/control requirements specified in this section.]	Standards – 40 CFR 63.5805(b) – See b)(2)e., b)(2)f., d)(4), e)(3), and f(2).
e.	40 CFR 63.1 – 15 (40 CFR 63.6013)	Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-21-25, and 40 CFR Part 63, Subpart WWWW.

b. The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions [see c)(1)] and are being established for purposes of avoiding PSD major source status. For purposes of federal enforceability, restricting OCs effectively restricts VOCs.

c. All emissions from scrap generation are fugitive.

d. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(D)(1)	VOC Work Practices
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates

e. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #1 for closed molding operation using injection /compression molding.

f. The company shall comply with (or have complied with, as applicable) the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.

Note: the Table 2 dates have passed, and the permittee had been determined to have achieved compliance accordingly.

c) Operational Restrictions

(1) The maximum annual SMC usage for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined, shall not exceed any of the following:

a. 2,000,000 lbs of preheated SMC;

b. 56,600,000 lbs of non-preheated SMC; and

c. 56,600,000 lbs of combined SMC (preheated and/or non-preheated).

The annual SMC usage restrictions shall be based upon a rolling 12-month summation of the monthly SMC input rates.

[OAC 3745-77-07(A)(1), PTI 03-13557 and PTI 03-13810]

(2) The maximum annual scrap generation for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined, shall not exceed 56,600,000 lbs per rolling, 12-month period.

[OAC 3745-77-07(A)(1), PTI 03-13557 and PTI 03-13810]

(3) Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

[OAC 3745-77-07(A)(1) and PTI 03-13557]

(4) The permittee must uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be re-covered after slitting.

[OAC rule 3745-77-07(A)(1), Table 4 to 40 CFR Part 63, Subpart WWWW, and Table 1 to OAC 3745-21-25]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to demonstrate compliance with the usage restrictions in c)(1) and the allowable OC emission limitation of 58.10 tons per rolling 12-month period (for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

a. the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;

b. the total mass of raw SMC preheated before use in all compression molding presses, in pounds;

c. the total mass of raw SMC used in all compression molding presses [d)(1)a + d)(1)b], in pounds;

d. the calculated OC emissions, in pounds or tons, using the following equations;

OC emissions (preheated) = [lbs/month, from d)(1)b] x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = [lbs/month, from d)(1)a] x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

e. the rolling 12-month summation of: the monthly SMC usage rates, in pounds, for the non-preheated [from d)(1)a]; preheated [from d)(1)b]; and total (preheated and non-preheated) [from d)(1)c] SMC usages; and the rolling 12-month summation of: the monthly OC emission rates [from d)(1)d], in tons.

*Emission factors were supplied by permittee and based on laboratory testing.

[OAC rule 3745-77-07(C)(1), PTI 03-13557 and PTI 03-13810]

(2) In order to demonstrate compliance with the usage restrictions in condition c)(2) and the allowable OC emission limitation of 28.30 tons per rolling, 12-month period (for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

a. the company identification of each type of scrap SMC generated;

b. the total mass of scrap SMC generated, in pounds;

c. the styrene content of each type of scrap SMC generated, in %, by weight;

d. the weight, in pounds, of each type of scrap SMC generated;

e. the calculated average styrene content for all the scrap SMC generated, in weight % {summation of [d)(2)c x d)(2)d], divided by d)(2)b, and multiplied by 100%} ;

f. the total mass of OC emissions generated by all molding presses [d)(2)b x d)(2)e x 0.40 volatilization factor*], in pounds; and

g. the rolling 12-month summation of the SMC scrap generation, in pounds, and the rolling 12-month summation of the monthly OC emissions, in tons.

*Emission factor supplied by permittee and based on laboratory testing.

[OAC rule 3745-77-07(C)(1), PTI 03-13557 and PTI 03-13810]

(3) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(O)(1)	Demonstration of continuous compliance and the associated monitoring and data collection requirements
OAC rule 3745-21-25(P)(1) and (P)(4)	Record keeping requirements

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

(4) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5915(a) and (d)	Records that must be kept
63.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. any exceedances of the maximum annual SMC usage restrictions of: 2,000,000 lbs of preheated SMC; 56,600,000 of non-preheated SMC; and 56,600,000 lbs of all SMC combined (preheated and non-preheated);

b. any exceedances of the maximum annual SMC scrap generation restriction of 56,600,000 lbs; and

c. anyexceedances of the rolling 12-month OC emissions limitations of: 58.10 tons (for SMC compression molding); and 28.30 tons (for scrap generation).

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

[OAC rule 3745-77-07(C)(1), PTI 03-13557 and PTI 03-13810]

(2) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required by OAC rule 3745-21-25:

OAC rule 3745-21-25(Q)(1), (Q)(2), (Q)(3), and (Q)(5)	Reporting requirements
OAC rule 3745-21-25 (S)(1)	Requirements on applicability notification, permit application and testing notification

[OAC rule 3745-77-07 (C)(1) and OAC rule 3745-21-25]

(3) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a)–(d), (f)–(i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart WWWW]

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

[OAC rule 3745-15-03(A)]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

a. <u>Emission Limitations</u>:
1.05 lbs OC per hour and 3.75 tons OC per year (compression molding)

<u>Applicable Compliance Method:</u>

The hourly OC emission limitation was established by multiplying the maximum hourly SMC usage rate of 300 lbs/hr by a worst-case emission factor of 0.0035 pound of OC per pound of SMC. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The annual emission limitation was established by multiplying the maximum usage rate of 2,000,000 lbs of SMC/yr by the worst case emission factor of 0.0035 lb of OC/lb of SMC for preheated material, plus multiplying 250,000 lb of SMC/yr by the emission factor of 0.002 lb of OC/lb of SMC for non-preheated material (the maximum usage rate of this emissions unit is 2,250,000 lbs of SMC/yr, of which 2,000,000 lbs of SMC/yr can be preheated.) Therefore, provided compliance is shown with the operational restrictions, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI 03-13557]

b. Emission Limitation: (compression molding)
58.10 tons OC per rolling 12-month period, for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation through the record keeping required in d)(1).

[OAC rule 3745-77-07(C)(1), PTI 03-13810 and PTI 03-13557]

c. Emission Limitation: (scrap generation)
28.30 tons OC per rolling 12-month period, for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation through the record keeping required in d)(2).

[OAC rule 3745-77-07(C)(1), PTI 03-13557 and PTI 03-13810]

(2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #1 and Item #3
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

(1) None.

7. Emissions Unit Group -Compression Molding Presses (E): P039, P040, P041 and P042,

EU ID	Operations, Property and/or Equipment Description
P039	Compression molding press 21.
P040	Compression press 22.
P041	Compression press 23A.
P042	Compression press 41.

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) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 03-13810 issued on 9/26/2002)	Compression Molding (SMC) 2.25 lbs organic compound (OC)/hour, 6.25 tons OC/year from each emissions unit individually. See b)(2)a.
b.	OAC rule 3745-31-05(D) (PTI 03-13810 issued on 9/26/2002)	SMC compression molding: 58.10 tons OC per rolling 12-month period for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined. SMC scrap generation: 28.3 tons OC per rolling 12-month period for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined. See b)(2)b. and b)(2)c.

c.	OAC rule 3745-21-25	See b)(2)d., d(3), and e)(2).
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5785 – 5935) [In accordance with 40 CFR 63.5790(b), this emissions unit is an existing "closed molding" affected source subject to the emission limitations/control requirements specified in this section.]	Standards – 40 CFR 63.5805(b) – See b)(2)e., b)(2)f., d)(4), e)(3), and f(2).
e.	40 CFR 63.1 – 15 (40 CFR 63.6013)	Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-21-25, and 40 CFR Part 63, Subpart WWWW.

b. The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions [see c)(1)] and are being established for purposes of avoiding PSD major source status. For purposes of federal enforceability, restricting OCs effectively restricts VOCs.

c. All emissions from scrap generation are fugitive.

d. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(D)(1)	VOC Work Practices
OAC rule 3745-21-25(R)(1) and (R)(2)	Compliance dates

e. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #1 for closed molding operation using injection /compression molding.

f. The company shall comply with (or have complied with, as applicable) the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.

Note: the Table 2 dates have passed, and the permittee had been determined to have achieved compliance accordingly.

c) Operational Restrictions

(1) The maximum annual SMC usage for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined, shall not exceed any of the following:

a. 2,000,000 lbs of preheated SMC;

b. 56,600,000 lbs of non-preheated SMC; and

c. 56,600,000 lbs of combined SMC (preheated and/or non-preheated).

The annual SMC usage restrictions shall be based upon a rolling 12-month summation of the monthly SMC input rates.

[OAC 3745-77-07(A)(1) and PTI 03-13810]

(2) The maximum annual scrap generation for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined, shall not exceed 56,600,000 lbs per rolling, 12-month period.

[OAC 3745-77-07(A)(1) and PTI 03-13810]

(3) Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

[OAC 3745-77-07(A)(1) and PTI 03-13810]

(4) The permittee must uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be re-covered after slitting.

[OAC rule 3745-77-07(A)(1), Table 4 to 40 CFR Part 63, Subpart WWWW, and Table 1 to OAC 3745-21-25]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to demonstrate compliance with the usage restrictions in c)(1) and the allowable OC emission limitation of 58.10 tons per rolling 12-month period (for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

a. the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;

b. the total mass of raw SMC preheated before use in all compression molding presses, in pounds;

c. the total mass of raw SMC used in all compression molding presses [d)(1)a + d)(1)b], in pounds;

d. the calculated OC emissions, in pounds or tons, using the following equations;

OC emissions (preheated) = [lbs/month, from d)(1)b] x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = [lbs/month, from d)(1)a] x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

e. the rolling 12-month summation of: the monthly SMC usage rates, in pounds, for the non-preheated [from d)(1)a]; preheated [from d)(1)b]; and total (preheated and non-preheated) [from d)(1)c] SMC usages; and the rolling 12-month summation of: the monthly OC emission rates [from d)(1)d], in tons.

*Emission factors were supplied by permittee and based on laboratory testing.

[OAC rule 3745-77-07(C)(1) and PTI 03-13810]

(2) In order to demonstrate compliance with the usage restrictions in condition c)(2) and the allowable OC emission limitation of 28.30 tons per rolling, 12-month period (for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

a. the company identification of each type of scrap SMC generated;

b. the total mass of scrap SMC generated, in pounds;

c. the styrene content of each type of scrap SMC generated, in %, by weight;

d. the weight, in pounds, of each type of scrap SMC generated;

e. the calculated average styrene content for all the scrap SMC generated, in weight % {summation of [d)(2)c x d)(2)d], divided by d)(2)b, and multiplied by 100%} ;

f. the total mass of OC emissions generated by all molding presses [d)(2)b x d)(2)e x 0.40 volatilization factor*], in pounds; and

g. the rolling 12-month summation of the SMC scrap generation, in pounds, and the rolling 12-month summation of the monthly OC emissions, in tons.

*Emission factor supplied by permittee and based on laboratory testing.

[OAC rule 3745-77-07(C)(1) and PTI 03-13810]

(3) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(O)(1)	Demonstration of continuous compliance and the associated monitoring and data collection requirements
OAC rule 3745-21-25(P)(1) and (P)(4)	Record keeping requirements

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

(4) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5915(a) and (d)	Records that must be kept
63.5920(a) – (d)	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. any exceedances of the maximum annual SMC usage restrictions of: 2,000,000 lbs of preheated SMC; 56,600,000 of non-preheated SMC; and 56,600,000 lbs of all SMC combined (preheated and non-preheated);

b. any exceedances of the maximum annual SMC scrap generation restriction of 56,600,000 lbs; and

c. anyexceedances of the rolling 12-month OC emissions limitations of: 58.10 tons (for SMC compression molding); and 28.30 tons (for scrap generation).

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

[OAC rule 3745-77-07(C)(1) and PTI 03-13810]

(2) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required by OAC rule 3745-21-25:

OAC rule 3745-21-25(Q)(1), (Q)(2), (Q)(3), and (Q)(5)	Reporting requirements
OAC rule 3745-21-25 (S)(1)	Requirements on applicability notification, permit application and testing notification

[OAC rule 3745-77-07 (C)(1) and OAC rule 3745-21-25]

(3) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a)–(d), (f)–(i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart WWWW]

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

[OAC rule 3745-15-03(A)]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

a. <u>Emission Limitations</u>:
2.25 lbs OC per hour and 6.25 tons OC per year (compression molding)

<u>Applicable Compliance Method:</u>

The hourly OC emission limitation was established by multiplying the maximum hourly SMC usage rate of 500 lbs/hr by a worst-case emission factor of 0.0045 pound of OC per pound of SMC. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The annual emission limitation was established by multiplying the maximum usage rate of 2,000,000 lbs of SMC/yr by the worst case emission factor of 0.0045 lb of OC/lb of SMC for preheated material, plus multiplying 1,750,000 lb of SMC/yr by the emission factor of 0.002 lb of OC/lb of SMC for non-preheated material (the maximum usage rate of this emissions unit is 3,750,000 lbs of SMC/yr, of which 2,000,000 lbs of SMC/yr can be preheated.) Therefore, provided compliance is shown with the operational restrictions, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI 03-13810]

b. Emission Limitation: (compression molding)
58.10 tons OC per rolling 12-month period, for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation through the record keeping required in d)(1).

[OAC rule 3745-77-07(C)(1) and PTI 03-13810]

c. Emission Limitation: (scrap generation)
28.30 tons OC per rolling 12-month period, for emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P033, P034, P036, P037, P038, P039, P040, P041, and P042 combined

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation through the record keeping required in d)(2).

[OAC rule 3745-77-07(C)(1) and PTI 03-13810]

(2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #1 and Item #3
63.5900(a) – (c)	Continuous compliance requirements

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart WWWW]

g) Miscellaneous Requirements

(1) None.