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

10/1/2012

Certified Mail

Mr. Tony Giancola
Zehrco Plastics Inc. (Plant 2)
5500 Washington Ave.
Ashtabula, OH 44004-7100

Facility ID: 0204010265
Permit Number: P0108835
County: Ashtabula

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

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 8/29/2012. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

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

and

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

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

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

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA DAPC, Northeast District Office

Response to Comments

Facility ID:	0204010265
Facility Name:	Zehrco Plastics Inc. (Plant 2)
Facility Description:	Plastic parts manufacturing
Facility Address:	1501 West 47 th Street Ashtabula, OH 44004-0000 Ashtabula County
Permit:	P0108835, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Star Beacon on 08/31/2012. The comment period ended on 09/30/2012.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

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

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

1. Topic: None

a. Comment: None

b. Response: None

Ohio | Environmental Protection Agency

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Zehrco Plastics Inc. (Plant 2)

Facility ID:	0204010265
Permit Number:	P0108835
Permit Type:	Renewal
Issued:	10/1/2012
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
Zehrco Plastics Inc. (Plant 2)

Table of Contents

Authorization 1
A. Standard Terms and Conditions 2
1. Federally Enforceable Standard Terms and Conditions 3
2. Monitoring and Related Record Keeping and Reporting Requirements 3
3. Scheduled Maintenance 6
4. Risk Management Plans 7
5. Title IV Provisions 7
6. Severability Clause 7
7. General Requirements 7
8. Fees 8
9. Marketable Permit Programs 8
10. Reasonably Anticipated Operating Scenarios 9
11. Reopening for Cause 9
12. Federal and State Enforceability 9
13. Compliance Requirements 9
14. Permit Shield 11
15. Operational Flexibility 11
16. Emergencies 11
17. Off-Permit Changes 12
18. Compliance Method Requirements 12
19. Insignificant Activities or Emissions Levels 12
20. Permit to Install Requirement 13
21. Air Pollution Nuisance 13
22. Permanent Shutdown of an Emissions Unit 13
23. Title VI Provisions 13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only 14
25. Inspections and Information Requests 14
26. Scheduled Maintenance/Malfunction Reporting 15
27. Permit Transfers 15
28. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 15

B. Facility-Wide Terms and Conditions 16
C. Emissions Unit Terms and Conditions 25
1. R001, Paint Spray Booth Four Compartment 26
2. Emissions Unit Group - Mixers: P002, P005, P006, and P007 31
3. Emissions Unit Group - SMC Machines: P001, and P004 41
4. Emissions Unit Group - Thermoset Compression Mold Presses Group 1: P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, and P029 46
5. Emissions Unit Group - Thermoset Compression Mold Presses Group 2: P030, P031, P032, P033, P034, P035, and P036 52

Authorization

Facility ID: 0204010265
Facility Description: Plastic parts manufacturing
Application Number(s): A0038714, A0043728
Permit Number: P0108835
Permit Description: Renewal Title V permit, including a four-compartment paint spray booth (R001), four mixing operations (P002, P005 - P007), two SMC machines (P001 & P004), twenty eight thermoset compression mold presses (P009 - P036) and insignificant emissions units.
Permit Type: Renewal
Issue Date: 10/1/2012
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0084110

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

Zehrco Plastics Inc. (Plant 2)
1501 West 47 th Street
Ashtabula, OH 44004-0000

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

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

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

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

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

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

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

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

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

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

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

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

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

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

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

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

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

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

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

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

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

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

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

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule,

all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

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

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

(4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

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

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

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

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

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

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

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

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

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

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

6. Severability Clause

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

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

7. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

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

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

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

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; orthe permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

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

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

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

11. Reopening for Cause

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

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

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

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

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official

that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

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

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

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

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

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

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

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

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

14. Permit Shield

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

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

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

15. Operational Flexibility

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

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

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

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

17. Off-Permit Changes

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

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

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

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

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

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

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

23. Title VI Provisions

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

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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

24. Reporting Requirements Related to Monitoring and Record Keeping 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.

Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)Records Retention Requirements Under State Law Only Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

25. Inspections and Information Requests

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

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

26. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

27. Permit Transfers

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

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

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions

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

   a) None.

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.

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

3. The following emissions units, as well as all storage containers and mixing vessels in which coating, thinners and/or other additives, and cleaning materials are stored or mixed, all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials, and all storage container and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations contained in this permit are subject to 40 CFR Part 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

EU ID	Operations, Property and/or Equipment Description
R001	Spring Painting fiberglass reinforced plastic parts.

   The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart PPPP. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 2 of 40 CFR Part 63, Subpart PPPP. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart PPPP and Subpart A.

   [Authority for term: 40 CFR 63.4480 - 63.4581 and Table 2 of 40 CFR Part 63, Subpart PPPP]

4. The following emissions units, as well as cleaning of equipment used in reinforced plastic composites manufacture, VOC-containing materials storage, and repair operations on reinforced plastic composites parts that are manufactured at the facility contained in this permit are subject to 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

EU ID	Operations, Property and/or Equipment Description
P001	Old SMC Machine
P002	SMC Paste Mixing Machine
P004	New SMC Machine
P005	BMC Mixer No. 2
P006	BMC Mixer No. 3
P007	SMC Paste Mixing
P009	Thermoset Compression Mold Press No. 2
P010	Thermoset Compression Mold Press No. 5
P011	Thermoset Compression Mold Press No. 11

EU ID	Operations, Property and/or Equipment Description
P012	Thermoset Compression Mold Press No. 14
P013	Thermoset Compression Mold Press No. 23
P014	Thermoset Compression Mold Press No. 38
P015	Thermoset Compression Mold Press No. 39
P016	Thermoset Compression Mold Press No. 40
P017	Thermoset Compression Mold Press No. 41
P018	Thermoset Compression Mold Press No. 42
P019	Thermoset Compression Mold Press No. 43
P020	Thermoset Press No. 44
P021	Thermoset Compression Mold Press No. 45
P022	Thermoset Compression Mold Press No. 47
P023	Thermoset Compression Mold Press No. 48
P024	Thermoset Compression Mold Press No. 49
P025	Thermoset Compression Mold Press No. 50
P026	Thermoset Compression Mold Press No. 51
P027	Thermoset Compression Mold Press No. 52
P028	Thermoset Compression Mold Press No. 53
P029	Thermoset Compression Mold Press No. 54
P030	Press #55 thermall 300 ton
P031	Press #56 350 ton
P032	Press #57 Hull 300 ton
P033	Press #58 Hull 300 ton
P034	Press #59 200 ton
P035	Press #60 200 ton
P036	Press #10 25 ton
T003	< 7500 gallons Resin Tank No. 3.
T004	< 7500 gallons Resin Tank No. 4.
T005	< 7500 gallons Resin Tank No. 5.
T006	< 7500 gallons Resin Tank No. 6.
T007	< 7500 gallons Resin Tank No. 7.
T008	< 7500 gallons Resin Tank No. 8.
T009	< 7500 gallons Resin Tank No. 9.
T010	< 7500 gallons Tank No. 10.

The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart WWWW. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 15 of 40 CFR Part 63, Subpart WWWW. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart WWWW, and Subpart A.

[Authority for term: 40 CFR 63.5780 – 63.5935 and Table 15 of 40 CFR Part 63, Subpart WWWW]

5. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions 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 and 3745-21 and/or 40 CFR Part 60 or 63:

EU ID	Operations, Property and/or Equipment Description
T003	< 7500 gallons Resin Tank No. 3.
T004	< 7500 gallons Resin Tank No. 4.
T005	< 7500 gallons Resin Tank No. 5.
T006	< 7500 gallons Resin Tank No. 6.
T007	< 7500 gallons Resin Tank No. 7.
T008	< 7500 gallons Resin Tank No. 8.
T009	< 7500 gallons Resin Tank No. 9.
T010	< 7500 gallons Tank No. 10.

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

6. Requirements of OAC rule 3745-21-25:

a) VOC control requirements:

(1) The permittee shall meet the work practice standards in Table 1 of OAC rule 3745-21-25.

(2) Currently, the facility has VOC emissions less than the threshold of one hundred (100) tons per year from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, the permittee shall meet the VOC emissions limits in Table 2 of OAC rule 3745-21-25. The facility's VOC emissions threshold shall be calculated in accordance with OAC rule 3745-21-25(F) and section B.6.e).

(3) If the facility has VOC emissions equal to or greater than the threshold of one hundred (100) tons per year from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, the permittee shall reduce the total VOC emissions from these operations by at least ninety-five percent (95%) by weight. As an alternative to meeting 95% by weight reduction, the permittee may meet the VOC emissions limits in Table 3 of OAC rule 3745-21-25. The facility's VOC emissions threshold shall be calculated in accordance with OAC rule 3745-21-25(F) and section B.6.e).

(4) Once the facility equals or exceeds the one hundred (100) tons of VOC per year threshold of OAC rule 3745-21-25(D)(3), it is always subject to the requirements of the OAC rule 3745-21-25(D)(3).

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

b) Recordkeeping Requirements:

(1) In accordance with OAC rule 3745-21-25(P)(1), the permittee shall keep the following records:

a. a copy of each applicability notification and compliance status report submitted to comply with this rule, including all documentation supporting any applicability or compliance status; and

b. a certified statement that operations are in compliance with the work practice standards specified in Table 1 of the rule, as applicable.

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

(2) In accordance with OAC rule 3745-21-25(P)(4), all records specified in section B.6.b)(1) above shall be retained by the owner or operator for a period of not less than five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record and shall be made available to the director or any authorized representative of the director for review during normal business hours.

[Authority for term: OAC rule 3745-21-25(P)(4) and OAC rule 3745-77-07(C)(1)]

c) Reporting Requirements:

(1) In accordance with OAC rule 3745-21-25(Q)(1) and (Q)(3), the permittee shall submit semiannual compliance status reports containing the following information:

a. Company name and address;

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

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

d. If there are no deviations from any VOC emissions limitations and operating limits that apply and there are no deviations from the work practice standards in Table 1 of the OAC rule 3745-21-25, a statement that there were no deviations from VOC emissions limitations, operating limits, or work practice standards during the reporting period;

e. For each deviation from a VOC emissions limitation or operating limit and for each deviation from a work practice standard that occurs at an affected operation where a continuous monitoring system (CMS) is not used to comply with the VOC emissions limitation, operating, or work practice standard in OAC rule 3745-21-25, the compliance report shall contain the information in the following:

i. The total operating time of each following operation during the reporting period:

(a) Open molding;

(b) Compression/injection molding;

(c) Centrifugal casting;

(d) Continuous lamination;

(e) Continuous casting;

(f) Polymer casting;

(g) Pultrusion;

(h) SMC manufacturing;

(i) BMC manufacturing;

(j) Mixing;

(k) Cleaning of equipment used in reinforced plastic composites manufacture;

(l) VOC-containing materials storage; and

(m) Repair operations on reinforced plastic composites parts that are manufactured at the facility.

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

f. Where multiple compliance options are available, the permittee shall state in this compliance report if the permittee has changed compliance options since the last compliance report.

The semiannual compliance status reports shall be submitted no later than thirty calendar days after the end of each 6-month period to the appropriate Ohio EPA district office or local air agency. The first compliance report shall cover the period beginning on the compliance date that is specified in section B.6.d) below and ending on the June thirtieth or December thirty-first, whichever date is the first date following the end of the first calendar half after the compliance date in section B.6.d). Each subsequent compliance report shall cover the semiannual reporting period from January first through June thirtieth or the semiannual reporting period from July first through December thirty-first.

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

(2) In accordance with OAC rule 3745-21-25(Q)(4), the permittee shall report if the facility exceeded the one hundred tons of VOC per year emissions threshold if that exceedance would make the facility subject to OAC rule 3745-21-25(D)(3).

[Authority for term: OAC rule 3745-21-25(Q)(4) and OAC rule 3745-77-07(C)(1)]

(3) In accordance with OAC rule 3745-21-25(S)(1), the permittee of an affected operation, as described in section B.6.c)(1)e.i. above, shall notify the appropriate Ohio EPA district office or local air agency in writing that such operation is subject the OAC rule 3745-21-25. The notification, which shall be submitted no later than sixty days after December 14, 2009, shall provide the following information:

a. name and address of the owner or operator;

b. address (i.e., physical location) of the facility;

c. equipment description and Ohio EPA application number (if assigned) of the affected operation;

d. identification of the applicable requirements, the means of compliance, and the compliance date for the affected operation under OAC rule 3745-21-25; and

e. regarding a permit for the affected operation, whichever of the following is applicable:

i. submission of an application for an operating permit, a permit modification, or an operating permit renewal in accordance with OAC rule 3745-31-02; or

ii. submission of a statement of intent to submit an application for a Title V permit or modification of a Title V permit accordance with OAC rule 3745-77-02 or 3745-77-06, respectively.

[Authority for term: OAC rule 3745-21-25(S)(1) and OAC rule 3745-77-07(A)(3)]

d) Compliance date of OAC rule 3745-21-25 for this facility is December 14, 2009.

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

e) Calculation of facility's VOC emissions threshold

(1) In accordance with OAC rule 3745-21-25(F)(1), to calculate the facility's VOC emissions threshold in tons per year for purposes of determining which requirements apply under OAC rule 3745-21-25 (D), the permittee shall use the procedures in section B.6.e)(2) below. A facility's VOC emissions threshold pertains to the following operations: open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing. For facility's VOC emissions threshold, calculate VOC emissions prior to any add-on control device, and do not include VOC

emissions from any resin or gel coat used in operations subject to the boat manufacturing NESHAP, 40 CFR Part 63, Subpart VVVV, or from the manufacture of large parts as defined in OAC rule 3745-21-25(D)(4). This facility is an "existing facility".

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

(2) In accordance with OAC rule 3745-21-25(F)(3), the permittee may use the procedures in either section B.6.e)(2)a or section B.6.e)(2)b below for the operations specified in section B.6.e)(1) above. If the emission factors for this facility have changed over the period of time prior to its initial compliance date due to incorporation of pollution-prevention control techniques, the facility may base the average emission factor on its operations as they exist on the compliance date. If the facility has accepted an enforceable permit limit that would result in less than one hundred tons per year (per rolling, 12-month period) of VOC measured prior to any add-on controls, and can demonstrate that it will operate at that level subsequent to the compliance date, it can be deemed to be below the one hundred tons per year threshold.

a. Use a calculated emission factor

Calculate a weighted average VOC emissions factor on a pounds per ton of resin, monomer, or gel coat basis. Base the weighted average on the prior twelve months of operation. Multiply the weighted average VOC emissions factor by resin, monomer or gel coat use over the same period. The permittee may calculate this VOC emissions factor based on the equations in Table 1 to Subpart WWWW of 40 CFR Part 63, or the permittee may use any VOC emission factor approved by USEPA, such as emission factors or emission factor equations from AP-42, or site-specific VOC emissions factors if they are supported by VOC emissions test data. The organic HAP emission factors in Table 1 to Subpart WWWW of 40 CFR Part 63 are equivalent to the VOC emissions factors for this rule.

b. Conduct performance testing

Conduct performance testing using the test procedures in 40 CFR 63.5850 or paragraph (C) of rule 3745-21-10 of the Administrative Code to determine a site-specific VOC emissions factor in units of pounds of VOC per ton of resin, monomer, or gel coat used. Conduct the test under conditions expected to result in the highest possible VOC emissions. Multiply this factor by annual resin, monomer, or gel coat use to determine annual VOC emissions. This calculation shall be repeated and reported annually.

[Authority for term: OAC rule 3745-21-25(F)(3) and OAC rule 3745-77-07(C)(1)]

(3) In accordance with OAC rule 3745-21-25(F)(4), the facility shall initially perform this calculation based on its 12-month of operation prior to December 14, 2009, and include this information with its applicability notification report. The facility shall repeat the calculation based upon its resin, monomer, and gel coat use in the 12 months prior to its compliance date, and submit this information with their initial compliance report.

[Authority for term: OAC rule 3745-21-25 (F)(4) and OAC rule 3745-77-07(C)(1)]

(4) In accordance with OAC rule 3745-21-25(F)(5), after the initial compliance date, the facility shall calculate VOC emissions over the 12-month period ending June thirtieth or December thirty-first, whichever date is the first date following the compliance date specified in section B.6.d) above. Subsequent calculations should cover the periods in the semiannual compliance reports.

[Authority for term: OAC rule 3745-21-25(F)(5) and OAC rule 3745-77-07(C)(1)]

C. Emissions Unit Terms and Conditions

1. R001, Paint Spray Booth Four Compartment

Operations, Property and/or Equipment Description:

A Despatch 4-compartment paint spray booth with dry filters used to coat molded fiberglass reinforced plastic (FRP) parts with general use coatings.

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 02-1805, issued on December 28, 1984 for emissions unit R001	The requirements of this rule include compliance with the requirements of OAC rule 3745-17-11(C) and 40 CFR Part 63, Subpart PPPP.
b.	OAC rule 3745-17-11(C)	See c)(1), c)(2), d)(1), d)(2), d)(3), d)(4), d)(5) and e)(2)a.
c.	40 CFR Part 63, Subpart PPPP 40 CFR 63.4480 – 63.4581	In accordance with 40 CFR 63.4490(b)(1), organic Hazardous Air Pollutant (HAP) emissions shall be limited to no more than 0.16 pound organic HAP emitted per pound coating solids used during each 12-month compliance period for each general use coating operation. See b)(2)a and b)(2)b.
d.	40 CFR 63.1 - 63.15	The General Provisions that apply are specified in Table 2 of 40 CFR Part 63, Subpart PPPP.

(2) Additional Terms and Conditions

a. The permittee must include all coating (as defined in 40 CFR 63.4581), thinners and/or other additives, and cleaning materials used in this emissions unit when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in section b)(1)c above. To make this determination, the permittee must use at least one of the following compliance operations. The permittee may apply any of the compliance options to an individual coating

operation, or to multiple coating operations as a group, or to the entire affected source. The permittee may use different compliance options for different coating operations or at different times on the same coating operation. The permittee may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, the permittee may not use different compliance options at the same time on the same coating operations. If the permittee switches between compliance options for any coating operation or group of coating operations, the permittee must document this switch as required by 40 CFR 63.4530(c), the permittee must report it in the next semiannual compliance report required in 40 CFR 63.4520.

i. Compliant material option:

Demonstrate 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 section b)(1)c above, 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.

ii. Emission rate without add-on controls options.

Demonstrate that, based on the coatings, thinners and/or, other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emissions limit in b)(1)c, calculated as a rolling, 12-month emission rate and determined on a monthly basis. The permittee must meet all the requirements of 40 CFR 63.4550, 63.4551 and 63.4552 to demonstrate compliance with the emission limit using this option.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.4491(a) – (b)]

b. The permittee must be in compliance with the emission limitations in b)(1)c at all times.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.4500(a)(1)]

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-17-11(C)(1), OAC rule 3745-17-11(C)(2)(b), and OAC rule 3745-77-07(A)(1)]

(2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[Authority for term: OAC rule 3745-17-11(C)(2)(e) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements:

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC 3745-17-11(C)(2)(a) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-17-11(C)(2)(c) and OAC rule 3745-77-07(C)(1)]

(3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-17-11(C)(2)(c) and OAC rule 3745-77-07(C)(1)]

(4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rule 3745-17-11(C)(2)(d) and (f) and OAC rule 3745-77-07(C)(1)]

(5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-17-11(C)(2)(e), (f) and (g), OAC rule 3745-17-11(C)(1) and OAC rule 3745-77-07(C)(1)]

(6) The permittee shall collect and record the information, as required by the following rules, each month for this emissions unit:

a. 40 CFR Part 63, Subpart PPPP, including section 63.4530; and

b. 40 CFR Part 63, Subpart PPPP, including section 63.4531.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.4530 and 63.4531]

e) Reporting Requirements:

(1) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart PPPP, including sections 63.4510 and 63.4520.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.4510 and 63.4520]

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

a. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation; and

b. any monthly record showing that HAP emissions from this emissions unit exceeded the limit in b)(1)c and the actual HAP emissions from each such month.

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

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 Limitation:

Organic HAP emissions shall be limited to no more than 0.16 pound organic HAP emitted per pound coating solids used during each 12-month compliance period for each general use coating operation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(6).

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

g) Miscellaneous Requirements:

(1) None.

2. Emissions Unit Group - Mixers: P002, P005, P006, and P007

EU ID	Operations, Property and/or Equipment Description
P002	a) A sheet molding compound (SMC) paste and bulk molding compound (BMC) mixing operation, inlcuding 2 Hockmeyer and 1 Cowles mixers for portable batch tanks.
P005	A bulk molding compound (BMC) mixer No. 2
P006	A bulk molding compound (BMC) mixer No. 3.
P007	A sheet molding compound (SMC) mixer

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

(1) 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 02-2866 for emissions unit P002, issued on October 16th, 1986 PTI 02-9122 for emissions unit P005, issued on June 2nd, 2005 PTI 02-0566 for emissions unit P006, issued on November 6th, 1996 PTI 02-2552 for emissions unit P007, issued on December 21st, 1999	The requirements of this rule include compliance with the requirements of OAC rule 3745-21-25 and 40 CFR Part 63, Subpart WWWW. See b)(2)a.
b.	OAC rule 3745-21-07(M)	See b)(2)b.
c.	OAC rule 3745-21-25(D)(1)	The work practice standards specified in Table 1 of this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4. See c)(1).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(1).
e.	40 CFR 63.1 - 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

a. Organic compound (OC) emissions shall not exceed the following:

i. For emissions unit P005, 8 pounds per hour, 32 pounds per day, and 5.84 tons per year, including cleanup materials.

ii. For emissions unit P006:

(a) 2.62 pounds per hour, 40 pounds per day, and 7.3 tons per year from the mixing operation; and

(b) 2.4 pounds per hour, 19.2 pounds per day, and 3.51 tons per year from cleanup materials.

iii. For emissions unit P007:

(a) 2.42 pounds per hour, 40 pounds per day, and 7.3 tons per year from the mixing operation; and

(b) 19.8 pounds per day, and 3.61 tons per year from cleanup materials.

[Authority for term: PTI No. 02-2866, PTI No. 02-9122, PTI No. 02-0566, PTI No. 02-2552, OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

b. Emissions units P002, P005, P006, and P007 are not equipped with control equipment for OC emissions. In accordance with OAC rule 3745-21-07(M)(3), these emissions units are not subject to the requirements of OAC rule 3745-21-07(M)(2).

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

c) Operational Restrictions

(1) All mixing or BMC manufacturing operations shall meet the following work practices:

a. Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1.0 inch are permissible around mixer shafts and any required instrumentation;

b. Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a ninety-five per cent (95%) efficient control device are exempt from this requirement; and

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

[Authority for term: OAC rule 3745-21-25(D)(1), Table 1 of OAC rule 3745-21-25, 40 CFR 63.5805(b), Table 4 of 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) 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 02-9122, issued on June 2, 2005 for emissions unit P005, Permit to Install 02-0566, issued on November 6, 1996 for emissions unit P006, and Permit to Install 02-2552 issued on December 21st, 1999 for emissions unit P007: d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Installs 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.

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

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

a. The company identification of each mold compound and each cleanup material employed;

b. The weight of each mold compound employed, in pounds per day;

c. The OC content of each mold compound, in percent by weight;

d. The volume of each cleanup material employed, in gallons;

e. The OC content of each cleanup material, in pounds per gallon;

f. The volume of each waste cleanup material collected for reuse or disposal in gallons;

g. The volume of each evaporated cleanup material, which is calculated by subtracting the volume of waste cleanup material employed from the volume of cleanup material reused or disposed of, as “d” – “f”, in gallons;

h. The number of hours the emissions unit was operated;

i. The OC emissions from cleanup materials in pounds per day, calculated as following:

$E_C = \sum_{j=1}^{m}[(VC)(OCc)]j$

where:

E_C = daily OC emissions from cleanup materials, in pounds per day;

VC = volume of each evaporated cleanup material, in gallons, as recorded in d)(2)g;

OCc = OC content of each cleanup material, in pounds per gallon, as recorded in d)(2)e;

j =subscript denoting an individual cleanup material; and

m = the total number of different cleanup materials.

j. The OC emissions from mixing operations, in pounds per day, calculated as specified below:

$E_M = (EF)\sum_{i=1}^{n}[(WT)(OC)]i$

where:

E_M = total OC emissions from all mold compound materials, in pounds per day;

WT = total weight of each mold compound material employed in the mixer as recorded in d)(2)b;

OC = OC content of each mold compound material mixed, in percent by weight, as recorded in d)(2)c;

EF = emission factor of 0.25%. The emission factor of 0.25% of available HAP is taken from Table 5-2 “Average HAP emission Equations by Process” in US EPA’s document “Hazardous Air Pollutant Emissions from the Production of Reinforced Plastic Composites Backgrounds Information Document for Proposed Standards”;

i = subscript denoting an individual mold compound material; and

n = the total number of different mold compound materials.

k. The total daily OC emissions from the mixing operations and cleanup materials, in pounds per day, calculated by summing the emissions calculated in d)(2)i and d)(2)j;

l. The average hourly OC emissions from each emissions unit shall be determined by the following:

i. For emissions unit P005, it shall be calculated by dividing the daily OC emissions determined in d)(2)k above by the daily operating hours as recorded in d)(2)h; and

ii. For emissions units P006 and P007,

(a) The average hourly OC emissions from cleanup materials, in pounds per hour, calculated by dividing the emissions determined in d)(2)i above by the hours of operation as recorded in d)(2)h; and

(b) The average hourly OC emissions from mixing operations, in pounds per hour, calculated by dividing the emissions determined in d)(2)j above by the hours of operation as recorded in d)(2)h.

The calculation required in d)(2)a through d)(2)l shall be completed no later than 10 calendar days following the end of each month, except the cleanup emissions shall be calculated no later than 10 calendar days following receipt of the recycle/recovery information.

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

(3) The permittee shall conduct a daily inspection and maintain a log of these inspections for each emissions unit. The log shall include the compliance status of each work practice standard identified in c)(1) and shall contain the following information:

a. whether the emissions unit was in operation;

b. whether the mixer cover was employed, except when adding materials or changing covers to the mixing vessels;

c. whether there was a visible gap present in the mixer cover, except the gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation; and

d. whether the mixer vent was open, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety.

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

(4) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart WWWW, including sections 63.5895, 63.5900, 63.5915 and 63.5920.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.5895, 63.5900, 63.5915 and 63.5920]

e) Reporting Requirements

(1) 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 02-9122, issued on June 2, 2005 for emissions unit P005, Permit to Install 02-0566, issued on November 6, 1996 for emissions unit P006, and Permit to Install 02-2552, issued on December 21st, 1999 for emissions unit P007: e)(2). The reporting requirements contained in the above-referenced Permit to Installs 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.

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

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

a. an identification of each day during which the average hourly OC emissions exceeded the following, and the actual hourly OC emissions for each such day:

i. 8 pounds per hour of OC emissions from emissions unit P005 including cleanup materials;

ii. 2.62 pounds per hour of OC emissions from emissions unit P006's mixing operation;

iii. 2.4 pounds per hour of OC emissions from emissions unit P006's cleanup materials; and

iv. 2.42 pounds per hour of OC emissions from emissions unit P007's mixing operation.

b. an identification of each day during which the daily OC emissions exceeded the following, and the actual daily OC emissions for each such day:

i. 32 pounds per day of OC emissions from emissions unit P005 including cleanup materials;

ii. 40 pounds per day of OC emissions from mixing operation of emissions units P006 and P007;

iii. 19.2 pounds per day of OC emissions from cleanup materials used in emissions unit P006; and

iv. 19.8 pounds per day of OC emissions from cleanup materials used in emissions unit P007.

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

(3) The permittee must submit semiannual compliance reports:

a. if there are no deviations from the work practice standards in c)(1), provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., the use of mixer cover with no visible gaps present in the mixer covers, mixer's vents and covers are closed during actual mixing operation, except during addition of materials); and

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

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-21-25(Q)(5) and OAC rule 3745-77-07(C)(1)]

(4) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart WWWW, including sections 63.5905, 63.5910 and Table 14.

[Authority for term: OAC rule 3745-77-07(A)(3) and 40 CFR 63.5905, 63.5910 and Table 14 of 40 CFR Part 63, Subpart WWWW]

f) Testing Requirements

(1) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 02-9122, issued on June 2, 2005 for emissions unit P005, Permit to Install 02-0566, issued on November 6, 1996 for emissions unit P006, and Permit to Install 02-2552, issued on December 21st, 1999 for emissions unit P007: f)(2). The testing requirements contained in the above-referenced Permit to Installs are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in these Permits to Install.

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

(2) 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 Limitation:

OC emissions from emissions unit P005 shall not exceed 8 pounds per hour including cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2)l.i.

b. Emission Limitation:

OC emissions from emissions unit P005 shall not exceed 32 pounds per day including cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2)k.

c. Emission Limitation:

Hourly OC emissions from mixing operations shall not exceed:

i. 2.62 pounds per hour from emissions unit P006; and

ii. 2.42 pounds per hour from emissions unit P007.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2)l.ii.(b).

d. Emission Limitation:

OC emissions from cleanup materials used in emissions unit P006 shall not exceed 2.4 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2)l.ii.(a).

e. Emission Limitation:

Daily OC emissions from mixing operations shall not exceed:

i. 40 pounds per day for emissions unit P006; and

ii. 40 pounds per day for emissions unit P007.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2)j.

f. Emission Limitation:

Daily OC emissions from cleanup materials shall not exceed:

i. 19.2 pounds per day from emissions unit P006; and

ii. 19.8 pounds per day from emissions unit P007.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2)i.

g. Emission Limitation:

OC emissions from emissions unit P005 shall not exceed 5.84 tons per year including cleanup materials.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2)k and shall be the summation for the calendar year divided by 2000 pounds per ton.

h. Emission Limitation:

Annual OC emissions from mixing operations shall not exceed:

i. 7.3 tons per year from emissions unit P006; and

ii. 7.3 tons per year from emissions unit P007.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2)j and shall be the summation for the calendar year.

i. Emission Limitation:

Annual OC emissions from cleanup materials shall not exceed:

i. 3.51 tons per year from emissions unit P006; and

ii. 3.61 tons per year from emissions unit P007.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2)i and shall be the summation for the calendar year.

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

(3) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart WWWW, including sections 63.5840, 63.5845 and 63.5850.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.5840, 63.5845 and 63.5850]

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group - SMC Machines: P001, and P004

EU ID	Operations, Property and/or Equipment Description
P001	The old sheet mold compound (SMC) machine. SMC paste and chopped fiber glass roving are cast onto a continuous nylon carrier film and are then covered by a nylon film for later use in the FRP molding presses.
P004	The new sheet molding compound (SMC) machine. SMC paste and chopped fiber glass roving are cast onto a continuous nylon carrier film and are then covered by a nylon film for later use in the FRP molding presses.

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 02-2866, issued on October 16, 1986 for emissions units P001 and P004	The requirements of this rule include compliance with the requirements of OAC rule 3745-21-25 and 40 CFR Part 63, Subpart WWWW.
b.	OAC rule 3745-21-07(M)(3)(g)	See b)(2)a.
c.	OAC rule 3745-21-25	VOC emissions from uncontrolled SMC manufacturing machine shall be less than 25.0 tons per rolling, 12-month period. The work practice standards specified in Table 1 of this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4. See b)(2)b and c)(1).
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(1).
e.	40 CFR 63.1 - 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

a. In accordance with OAC rule 3745-21-07(M)(5)(h), the provisions of paragraph (M)(3)(g) of OAC rule 3745-21-07 shall not apply to these emissions units, when complying with all work practice standards as specified in c)(1).

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

b. In accordance with OAC rule 3745-21-25(D)(9), these emissions units are exempted from the requirement of OAC rule 3745-21-25(D)(8) because uncontrolled VOC emissions from each emissions unit are less than 25.0 tons per rolling, 12-month period.

[Authority for term: OAC rule 3745-21-25(D)(9), 40 CFR 63.5805(b), Table 4 of 40 CFR Part 63, Subpart WWWW and OAC rule 3745-77-07(C)(1)]

c) Operational Restrictions

(1) SMC manufacturing operations shall meet the following work practice standards:

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

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

[Authority for term: OAC rule 3745-21-07(M), OAC rule 3745-21-25(D)(1), Table 1 of OAC rule 3745-21-25, 40 CFR 63.5805(b), Table 4 of 40 CFR Part 63, Subpart WWWW and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall keep the following records each month for each emissions unit:

a. the company identification of each SMC paste employed;

b. the weight, in pounds of each SMC paste employed;

c. the VOC content, in percent by weight, of each SMC paste employed;

d. the monthly VOC emissions, in pounds per month, and shall be calculated as follows:

$VOC_M = (EF)\sum_{i=1}^{n}[(WT)(VOC)]i$

where:

VOC_M = total VOC emissions from all SMC paste, in pounds per month;

WT = total weight of each SMC paste employed in the SMC machine as recorded in d)(1)b;

VOC = VOC content of each SMC paste employed, in percent by weight, as recorded in d)(1)c;

EF = emission factor of 0.247%. The emission factor of 0.247% of VOC emissions is derived from emission testing conducted on September 18, 2006;

i = subscript denoting an individual SMC paste; and

n = the total number of different SMC pastes; and

e. the rolling, 12-month total VOC emissions from each SMC machine, in tons per year.

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

(2) The permittee shall keep monthly production records of the following operational data for each SMC manufacturing machine:

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

b. the monomer content of each SMC product.

[Authority for term: OAC rule 3745-21-25(P)(2) and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall record the VOC emissions from each SMC manufacturing machine for the recent month and rolling, 12-month period within fifteen days after the end of each month.

[Authority for term: OAC rule 3745-21-25(P)(3) and OAC rule 3745-77-07(C)(1)]

(4) All records specified under d)(1), d)(2) and d)(3) shall be retained by the permittee for a period of not less than five years following the date of each occurrence, measurements, maintenance, corrective action, report or record and shall be made available to the director or any authorized representative of the director for review during normal business hours.

[Authority for term: OAC rule 3745-21-25(P)(4) and OAC rule 3745-77-07(C)(1)]

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

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

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

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

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

(6) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart WWWW, including sections 63.5895, 63.5900, 63.5915 and 63.5920.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.5895, 63.5900, 63.5915 and 63.5920]

e) Reporting Requirements

(1) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart WWWW, including sections 63.5905 and 63.5910.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.5905 and 63.5910]

(2) The permittee must submit semiannual compliance reports:

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

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

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-21-25(Q)(5) and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall notify the Ohio EPA, Northeast District Office of any record showing the SMC manufacturing machine exceeded the applicable VOC emissions limit. A copy of such record shall be sent to Ohio EPA, Northeast District Office within 45 days after exceedance occurs.

[Authority for term: OAC rule 3745-21-25(P)(3) and OAC rule 3745-77-07(C)(1)]

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 Limitation:

VOC emissions from uncontrolled SMC manufacturing machine shall be less than 25.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

(2) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart WWWW, including sections 63.5840, 63.5845 and 63.5850.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.5840, 63.5845 and 63.5850]

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group - Thermoset Compression Mold Presses Group 1: P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, and P029

EU ID	Operations, Property and/or Equipment Description
P009	Thermoset Compression Mold Press No. 2
P010	Thermoset Compression Mold Press No. 5
P011	Thermoset Compression Mold Press No. 11
P012	Thermoset Compression Mold Press No. 14
P013	Thermoset Compression Mold Press No. 23
P014	Thermoset Compression Mold Press No. 38
P015	Thermoset Compression Mold Press No. 39
P016	Thermoset Compression Mold Press No. 40
P017	Thermoset Compression Mold Press No. 41
P018	Thermoset Compression Mold Press No. 42
P019	Thermoset Compression Mold Press No. 43
P020	Thermoset Press No. 44
P021	Thermoset Compression Mold Press No. 45
P022	Thermoset Compression Mold Press No. 47
P023	Thermoset Compression Mold Press No. 48
P024	Thermoset Compression Mold Press No. 49
P025	Thermoset Compression Mold Press No. 50
P026	Thermoset Compression Mold Press No. 51
P027	Thermoset Compression Mold Press No. 52
P028	Thermoset Compression Mold Press No. 53
P029	Thermoset Compression Mold Press No. 54

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 02-22186, issued on November 14, 2006 for emissions units P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019,	See b)(2)a.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	P020, P021, P022, P023, P024, P025, P026, P027, P028 and P029.	
b.	OAC rule 3745-21-07(M)	See b)(2)b.
c.	OAC rule 3745-21-25	The work practice standards specified in Table 1 of this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4. See c)(1).
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(1).
e.	40 CFR 63.1 - 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

a. Volatile organic compounds/hazardous air pollutant (VOC/HAP) emissions shall not exceed the following:

EU ID	Equipment Description	Lbs/day	Tons/yr
P009	Thermoset Compression Mold Press No. 2	14.2	2.60
P010	Thermoset Compression Mold Press No. 5	14.2	2.60
P011	Thermoset Compression Mold Press No. 11	14.2	2.60
P012	Thermoset Compression Mold Press No. 14	14.2	2.60
P013	Thermoset Compression Mold Press No. 23	2.7	0.5
P014	Thermoset Compression Mold Press No. 38	40	7.30
P015	Thermoset Compression Mold Press No. 39	14.2	2.60
P016	Thermoset Compression Mold Press No. 40	14.2	2.60
P017	Thermoset Compression Mold Press No. 41	14.2	2.60
P018	Thermoset Compression Mold Press No. 42	14.2	2.60
P019	Thermoset Compression Mold Press No. 43	14.2	2.60
P020	Thermoset Press No. 44	14.2	2.60
P021	Thermoset Compression Mold Press No. 45	40	7.30
P022	Thermoset Compression Mold Press No. 47	40	7.30
P023	Thermoset Compression Mold Press No. 48	14.2	2.60
P024	Thermoset Compression Mold Press No. 49	40	7.30
P025	Thermoset Compression Mold Press No. 50	40	7.30
P026	Thermoset Compression Mold Press No. 51	40	7.30
P027	Thermoset Compression Mold Press No. 52	40	7.30
P028	Thermoset Compression Mold Press No. 53	14.2	2.60
P029	Thermoset Compression Mold Press No. 54	14.2	2.60

[Authority for term: PTI 02-22816, OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

b. Emissions units P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028 and P029 are not equipped with control equipment for organic compound emissions. In accordance with OAC rule 3745-21-07(M)(3), these emissions units are not subject to the requirements of OAC rule 3745-21-07(M)(2).

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

c) Operational Restrictions

(1) The permittee shall 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 shall be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials shall be recovered after slitting.

[Authority for term: OAC rule 3745-21-25(D)(1), Table 1 of OAC rule 3745-21-25, 40 CFR 63.5805(b), Table 4 of 40 CFR Part 63, Subpart WWWW and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) 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 02-22186, issued on November 14, 2006 for emissions unit P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P027, P028 and P029: 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.

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

(2) The permittee shall maintain the following daily records for each emissions unit:

a. the identification of each mold compound employed in the emissions unit;

b. the weight of each mold compound employed in the emissions unit;

c. the percent of available VOC/HAP, by weight, in each mold compound; and

d. the daily VOC/HAP emissions, calculated by the following equation, in pounds per day:

$$\text{VOC}\left(\frac{\text{lbs}}{day}\right) = (\text{EF})\sum_{\text{i}}^{\text{n}}[(\text{W})(\text{P})]\text{i}$$

where:

W = the weight of each mold compound employed, as recorded in d)(2)b;

P = the percent of available VOC/HAP, by weight, in each mold compound, as recorded in d)(2)c;

EF = emissions factor, which is 2% of the available HAP as documented in Table 5.2 of the background information document for the MACT, or the most recent factor should that factor be updated;

i = a specific SMC/BMC material employed during the day; and

n = total number of SMC/BMC materials employed during the day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-22186]

(3) The permittee shall conduct daily inspections of each emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in c)(1) and shall include the following information:

a. whether the emissions unit was in operation;

b. whether the permittee uncovered, unwrapped, or exposed more than one charge per mold cycle per compression/injection molding machine as specified in c)(1); and

c. information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-22186]

e) Reporting Requirements

(1) 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 02-22186, issued on November 14, 2006 for emissions unit P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P027, P028 and P029: e)(4). 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.

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

(2) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart WWWW, including sections 63.5905, 63.5910 and Table 14.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.5905 and 63.5910 and Table 14 of 40 CFR Part 63, Subpart WWWW]

(3) The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emissions exceeded the pounds per day limit for each emissions unit in b)(2)a, and the actual VOC emission for each such day of each such emissions unit. The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

(4) The permittee must submit semiannual compliance reports:

a. if there are no deviations from the work practice standards in c)(1), provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine); and

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

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-21-25(Q)(5) and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 02-22186, issued on November 14, 2006 for emissions unit P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P027, P028 and P029: f)(2). The testing requirements contained in the above-referenced Permit to Installs are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in these Permits to Install.

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

(2) 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:

Volatile organic compounds/hazardous air pollutant (VOC/HAP) emissions shall not exceed the following:

EU ID	Equipment Description	Lbs/day	Tons/yr
P009	Thermoset Compression Mold Press No. 2	14.2	2.60
P010	Thermoset Compression Mold Press No. 5	14.2	2.60
P011	Thermoset Compression Mold Press No. 11	14.2	2.60
P012	Thermoset Compression Mold Press No. 14	14.2	2.60
P013	Thermoset Compression Mold Press No. 23	2.7	0.5
P014	Thermoset Compression Mold Press No. 38	40	7.30
P015	Thermoset Compression Mold Press No. 39	14.2	2.60
P016	Thermoset Compression Mold Press No. 40	14.2	2.60
P017	Thermoset Compression Mold Press No. 41	14.2	2.60
P018	Thermoset Compression Mold Press No. 42	14.2	2.60
P019	Thermoset Compression Mold Press No. 43	14.2	2.60
P020	Thermoset Press No. 44	14.2	2.60
P021	Thermoset Compression Mold Press No. 45	40	7.30
P022	Thermoset Compression Mold Press No. 47	40	7.30
P023	Thermoset Compression Mold Press No. 48	14.2	2.60
P024	Thermoset Compression Mold Press No. 49	40	7.30
P025	Thermoset Compression Mold Press No. 50	40	7.30
P026	Thermoset Compression Mold Press No. 51	40	7.30
P027	Thermoset Compression Mold Press No. 52	40	7.30
P028	Thermoset Compression Mold Press No. 53	14.2	2.60
P029	Thermoset Compression Mold Press No. 54	14.2	2.60

Applicable Compliance Method:

Compliance with the daily emission limitations shall be demonstrated based upon the record keeping requirements specified in d)(2).

The tpy emission limitation was developed by multiplying the short-term allowable VOC/HAP emission limitation, in lbs/day, by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

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

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group - Thermoset Compression Mold Presses Group 2: P030, P031, P032, P033, P034, P035, and P036

EU ID	Operations, Property and/or Equipment Description
P030	Press #55 thermall 300 ton
P031	Press #56 350 ton
P032	Press #57 Hull 300 ton
P033	Press #58 Hull 300 ton
P034	Press #59 200 ton
P035	Press #60 200 ton
P036	Press #10 25 ton

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) as effective 11/30/01 PTI P0103952 issued on February 4th, 2009 for emissions units P030, P031, P032, P033, P034, P035, P036	See b)(2)a and b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(b) as effective 12/01/06 PTI P0103952 issued on February 4th, 2009 for emissions units P030, P031, P032, P033, P034, P035, P036	See b)(2)c.
c.	OAC rule 3745-21-07(M)	See b)(2)d.
d.	OAC rule 3745-21-25	The work practice standards specified in Table 1 of this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4. See c)(1).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(1).
f.	40 CFR 63.1 - 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

a. Volatile organic compounds/hazardous air pollutant (VOC/HAP) emissions shall not exceed the following:

EU ID	Equipment Description	Lbs/day	Tons/yr
P030	Press #55 thermall 300 ton	2.7	0.5
P031	Press #56 350 ton	14.2	2.6
P032	Press #57 Hull 300 ton	14.2	2.6
P033	Press #58 Hull 300 ton	14.2	2.6
P034	Press #59 200 ton	14.2	2.6
P035	Press #60 200 ton	14.2	2.6
P036	Press #10 25 ton	14.2	2.6

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limitations/control measures no longer apply: b)(1)a, b)(2)a and b)(2)b.

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

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

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

[Authority for term: PTI P0103952, OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

d. Emissions units P030, P031, P032, P033, P034, P035 and P036 commenced installation after the effective date of OAC rule 3745-21-07(M). In accordance with OAC rule 3745-21-07(M)(3)(c)(i), these emissions units are not subject to the requirements of OAC rule 3745-21-07(M)(2).

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

c) Operational Restrictions

(1) The permittee shall 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 shall be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials shall be recovered after slitting.

[Authority for term: OAC rule 3745-21-25(D)(1), Table 1 of OAC rule 3745-21-25, 40 CFR 63.5805(b), Table 4 of 40 CFR Part 63, Subpart WWWW and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) 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 P0103952, issued on February 4th, 2009 for emissions units P030, P031, P032, P033, P034, P035 and P036: d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Installs 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.

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

(2) The permittee shall maintain the following daily records for each emissions unit:

a. the identification of each mold compound employed in the emissions unit;

b. the weight of each mold compound employed in the emissions unit;

c. the percent of available VOC/HAP, by weight, in each mold compound; and

d. the daily VOC/HAP emissions, calculated by the following equation, in pounds per day:

$$\text{VOC}\left(\frac{\text{lbs}}{day}\right) = (\text{EF})\sum_{\text{i}}^{\text{n}}[(\text{W})(\text{P})]\text{i}$$

where:

W = the weight of each mold compound employed, as recorded in d)(2)b;

P = the percent of available VOC/HAP, by weight, in each mold compound, as recorded in d)(2)c;

EF = emissions factor, which is 2% of the available HAP as documented in Table 5.2 of the background information document for the MACT, or the most recent factor should that factor be updated;

i = a specific SMC/BMC material employed during the day; and

n = total number of SMC/BMC materials employed during the day.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0103952]

(3) The permittee shall conduct daily inspections of each emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in c)(1) and shall include the following information:

a. whether the emissions unit was in operation;

b. whether the permittee uncovered, unwrapped, or exposed more than one charge per mold cycle per compression/injection molding machine as specified in section c)(1) above; and

c. information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0103952]

e) Reporting Requirements

(1) 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 P0103952, issued on February 4th, 2009 for emissions units P030, P031, P032, P033, P034, P035 and P036: e)(4). 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.

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

(2) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart WWWW, including sections 63.5905, 63.5910 and Table 14.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.5905 and 63.5910 and Table 14 of 40 CFR Part 63, Subpart WWWW]

(3) The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emissions exceeded the pounds per day limit for each emissions unit in b)(2)a, and the actual VOC emission for each such day of each such emissions unit. The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

(4) The permittee must submit semiannual compliance reports:

a. if there are no deviations from the work practice standards in c)(1), provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine); and

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

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-21-25(Q)(5) and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0103952, issued on February 4th, 2009 for emissions units P030, P031, P032, P033, P034, P035 and P036: f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in these Permits to Install.

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

(2) 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:

Volatile organic compounds/hazardous air pollutant (VOC/HAP) emissions shall not exceed the following:

EU ID	Equipment Description	Lbs/day	Tons/yr
P030	Press #55 thermall 300 ton	2.7	0.5
P031	Press #56 350 ton	14.2	2.6
P032	Press #57 Hull 300 ton	14.2	2.6
P033	Press #58 Hull 300 ton	14.2	2.6
P034	Press #59 200 ton	14.2	2.6
P035	Press #60 200 ton	14.2	2.6
P036	Press #10 25 ton	14.2	2.6

Applicable Compliance Method:

Compliance with the daily emission limits shall be demonstrated based upon the record keeping requirements specified in d)(2).

The tpy emission limitation was developed by multiplying the short-term allowable VOC/HAP emission limitation, in lbs/day, by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

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

g) Miscellaneous Requirements

(1) None.