



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

12/20/2012

Perry Bennett  
MFG, Composite Systems  
2925 MFG Place  
Box 675  
Ashtabula, OH 44004

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0204010230  
Permit Number: P0110952  
Permit Type: Administrative Modification  
County: Ashtabula

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

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

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
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

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

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

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





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: MFG manufactures reinforced fiberglass plastic parts, and sheet and liquid molding compounds (SMC and LMC) which are employed in the compression mold presses to produce parts for various industrial applications. The facility consists of two plants, the main production building, and a research division. The research facility is located approximately a mile from the main plant. A few of the research emissions units have been prepared for full scale production, and may be moved to the main production building at some time in the future. MFG requested the two facilities be combined to avoid future permitting issues and delays in production.

3. Facility Emissions and Attainment Status: MFG has requested a 230 ton/year facility-wide VOC limitation to avoid future PSD permitting. They are subject to 40 CFR Part 63, Subparts PPPP and WWWW. Until such a time as emissions from SMC, mixing and BMC manufacturing exceed 100 tons/year, MFG will not be subject to the control requirements listed in OAC rule 3745-21-25.

4. Source Emissions: Between the Research Division and the main production plant, MFG emits VOC from 2 coating lines (subject to PPPP), 28 research and production presses, 5 mixers and several insignificant processes. PTE for VOC is greater than 370 tons/year. Actual VOC emissions, based on historic record keeping and reporting, are less than 50 tons/year. MFG is requesting a 230 ton/year facility-wide VOC limitation to allow for substantial growth while avoiding future PSD permitting.

5. Conclusion: Actual emissions are significantly lower than major source thresholds. Facility-wide VOC restrictions, record keeping and reporting will sufficiently demonstrate compliance with all applicable rules/permit limits. Historic emissions testing and engineering studies confirm that actual emissions from SMC manufacture and mixing operations are much lower than PTE.

6. Please provide additional notes or comments as necessary:

None

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	230



PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install  
MFG, Composite Systems

Issue Date: 12/20/2012

Permit Number: P0110952

Permit Type: Administrative Modification

Permit Description: Administrative modification to change BAT emission limits to reflect correct PTE based on current emission factors; incorporate MACT and OAC rule 3745-21-25 requirements; update terms and conditions; and added a total VOC emission restriction to reduced PTE for future projects.

Facility ID: 0204010230

Facility Location: MFG, Composite Systems  
2925 MFG Place, Box 675  
Ashtabula, OH 44004

Facility Description: All Other Plastics Product Manufacturing

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitonline.aspx> by entering the permit # or: Zorica Dejanovic, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171





**DRAFT**

**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
MFG, Composite Systems

Facility ID:	0204010230
Permit Number:	P0110952
Permit Type:	Administrative Modification
Issued:	12/20/2012
Effective:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
MFG, Composite Systems

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	6
1. Federally Enforceable Standard Terms and Conditions .....	7
2. Severability Clause .....	7
3. General Requirements .....	7
4. Monitoring and Related Record Keeping and Reporting Requirements.....	8
5. Scheduled Maintenance/Malfunction Reporting .....	9
6. Compliance Requirements .....	9
7. Best Available Technology .....	10
8. Air Pollution Nuisance .....	10
9. Reporting Requirements .....	10
10. Applicability .....	11
11. Construction of New Sources(s) and Authorization to Install .....	11
12. Permit-To-Operate Application .....	12
13. Construction Compliance Certification .....	12
14. Public Disclosure .....	12
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations .....	13
16. Fees.....	13
17. Permit Transfers .....	13
18. Risk Management Plans .....	13
19. Title IV Provisions .....	13
B. Facility-Wide Terms and Conditions.....	14
C. Emissions Unit Terms and Conditions .....	20
1. Emissions Unit Group – Front Line Coating Booths - K003, K004 .....	21
2. Emissions Unit Group – SMC Machines: P007, P066, and P070 .....	25
3. Emissions Unit Group - Mixers: P029, P040, P043, P044, P045, P048.....	28
4. Emissions Unit Group – Compression Mold Presses: Group 1 - P022, P023; Group 2 - P020, P021, P071, P072; Group 3 - P016, P017, P018, P024, P038, P069; Group 4 - P032, P037, P046, P051, P074; Group 5 - P019, P030; Group 6 - P014, P015; Group 7 - P006, P012, P042, P068; and Group 8 - P031, P033, P049.....	34
5. P073, Parts preparation/inspection .....	38





**Draft Permit-to-Install**  
MFG, Composite Systems  
**Permit Number:** P0110952  
**Facility ID:** 0204010230

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0204010230  
Facility Description: Reinforced plastic composite products manufacturing  
Application Number(s): A0045488, A0046353  
Permit Number: P0110952  
Permit Description: Administrative modification to change BAT emission limits to reflect correct PTE based on current emission factors; incorporate MACT and OAC rule 3745-21-25 requirements; update terms and conditions; and added a total VOC emission restriction to reduced PTE for future projects.  
Permit Type: Administrative Modification  
Permit Fee: \$4,000.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 12/20/2012  
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

MFG, Composite Systems  
2925 MFG Place  
Box 675  
Ashtabula, OH 44004

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

Ohio Environmental Protection Agency (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 Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0110952

Permit Description: Administrative modification to change BAT emission limits to reflect correct PTE based on current emission factors; incorporate MACT and OAC rule 3745-21-25 requirements; update terms and conditions; and added a total VOC emission restriction to reduced PTE for future projects.

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

<b>Emissions Unit ID:</b>	<b>P073</b>
Company Equipment ID:	Parts preparation/inspection
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: Coating Booths**

<b>Emissions Unit ID:</b>	<b>K003</b>
Company Equipment ID:	Front line prime coating booth
Superseded Permit Number:	02-9123
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K004</b>
Company Equipment ID:	Front line top coat spray booth
Superseded Permit Number:	02-9123
General Permit Category and Type:	Not Applicable

**Group Name: Mixers**

<b>Emissions Unit ID:</b>	<b>P029</b>
Company Equipment ID:	Cowles mixer 3
Superseded Permit Number:	02-22745
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P040</b>
Company Equipment ID:	Mixer 4
Superseded Permit Number:	02-18623
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P043</b>
Company Equipment ID:	Cowles mixer 6
Superseded Permit Number:	P0104435
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P044</b>
Company Equipment ID:	Cowles mixer 7
Superseded Permit Number:	P0104435
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P045</b>
Company Equipment ID:	Cowles mixer 8
Superseded Permit Number:	P0104435
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P048</b>
Company Equipment ID:	Bead Blender
Superseded Permit Number:	02-22866
General Permit Category and Type:	Not Applicable



**Group Name: Presses Group 1**

<b>Emissions Unit ID:</b>	<b>P006</b>
Company Equipment ID:	Compression mold press 225
Superseded Permit Number:	02-11578
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P012</b>
Company Equipment ID:	Compression mold press 227
Superseded Permit Number:	02-11578
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P042</b>
Company Equipment ID:	Compression mold press 224
Superseded Permit Number:	02-19632
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P068</b>
Company Equipment ID:	RD Press 5
Superseded Permit Number:	02-15023
General Permit Category and Type:	Not Applicable

**Group Name: Presses Group 2**

<b>Emissions Unit ID:</b>	<b>P014</b>
Company Equipment ID:	Compression mold press 222
Superseded Permit Number:	02-11578
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P015</b>
Company Equipment ID:	Compression mold press 221
Superseded Permit Number:	02-11578
General Permit Category and Type:	Not Applicable

**Group Name: Presses Group 3**

<b>Emissions Unit ID:</b>	<b>P016</b>
Company Equipment ID:	Compression mold press 202
Superseded Permit Number:	02-11578
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P017</b>
Company Equipment ID:	Compression mold press 201
Superseded Permit Number:	02-11578
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P018</b>
Company Equipment ID:	Compression mold press 203
Superseded Permit Number:	02-11578
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P024</b>
Company Equipment ID:	Compression mold press 219
Superseded Permit Number:	02-11578
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P038</b>
Company Equipment ID:	Compression mold press 209
Superseded Permit Number:	02-18139
General Permit Category and Type:	Not Applicable



**Effective Date:** To be entered upon final issuance

<b>Emissions Unit ID:</b>	<b>P069</b>
Company Equipment ID:	RD 500 ton williams press
Superseded Permit Number:	02-18269
General Permit Category andType:	Not Applicable

**Group Name: Presses Group 4**

<b>Emissions Unit ID:</b>	<b>P019</b>
Company Equipment ID:	Compression mold press 206
Superseded Permit Number:	02-11578
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P030</b>
Company Equipment ID:	Compression mold press 226
Superseded Permit Number:	02-11578
General Permit Category andType:	Not Applicable

**Group Name: Presses Group 5**

<b>Emissions Unit ID:</b>	<b>P020</b>
Company Equipment ID:	Compression mold press 207
Superseded Permit Number:	02-11578
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P021</b>
Company Equipment ID:	Compression mold press 208
Superseded Permit Number:	02-11578
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P071</b>
Company Equipment ID:	Press 19
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P072</b>
Company Equipment ID:	Press 22
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

**Group Name: Presses Group 6**

<b>Emissions Unit ID:</b>	<b>P022</b>
Company Equipment ID:	Compression mold press 204
Superseded Permit Number:	02-11578
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P023</b>
Company Equipment ID:	Compression mold press 205
Superseded Permit Number:	02-11578
General Permit Category andType:	Not Applicable

**Group Name: Presses Group 7**

<b>Emissions Unit ID:</b>	<b>P031</b>
Company Equipment ID:	Compression mold press 228
Superseded Permit Number:	02-11578
General Permit Category andType:	Not Applicable



**Effective Date:** To be entered upon final issuance

<b>Emissions Unit ID:</b>	<b>P033</b>
Company Equipment ID:	Compression mold press 229
Superseded Permit Number:	02-11578
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P049</b>
Company Equipment ID:	Compression mold press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

**Group Name: Presses Group 8**

<b>Emissions Unit ID:</b>	<b>P032</b>
Company Equipment ID:	Compression mold press 231
Superseded Permit Number:	02-11578
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P037</b>
Company Equipment ID:	Compression mold press 233
Superseded Permit Number:	02-18139
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P046</b>
Company Equipment ID:	Compression mold press 210
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P051</b>
Company Equipment ID:	Compression mold press
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P074</b>
Company Equipment ID:	Compression mold press
Superseded Permit Number:	02-13667
General Permit Category andType:	Not Applicable

**Group Name: SMC Machines**

<b>Emissions Unit ID:</b>	<b>P007</b>
Company Equipment ID:	SMC Machine
Superseded Permit Number:	02-22745
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P066</b>
Company Equipment ID:	SMC Machine 1
Superseded Permit Number:	02-13589
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P070</b>
Company Equipment ID:	Carbon Fiber Molding
Superseded Permit Number:	02-19143
General Permit Category andType:	Not Applicable



**Draft Permit-to-Install**  
MFG, Composite Systems  
**Permit Number:** P0110952  
**Facility ID:** 0204010230  
**Effective Date:** To be entered upon final issuance

## **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.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

## **2. Severability Clause**

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## **3. 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 re-issuance, or modification.



- 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, revoked, or revoked and reissued, for cause. 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 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.

#### **4. 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, 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.
- 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, 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northeast District Office. The written 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. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. 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 are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **5. 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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## **6. Compliance Requirements**

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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.



- c) 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 ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office 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.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. 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.

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have



been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. 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.)

## **10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

## **11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

## **13. Construction Compliance Certification**

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## **14. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.



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

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 quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. 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. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**18. Risk Management Plans**

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

**19. 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.



**Draft Permit-to-Install**  
MFG, Composite Systems  
**Permit Number:** P0110952  
**Facility ID:** 0204010230  
**Effective Date:** To be entered upon final issuance

## **B. Facility-Wide Terms and Conditions**



**Effective Date:** To be entered upon final issuance

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. Volatile Organic Compound (VOC) emission limitation:

a) The combined VOC emissions from the following emissions units at this facility shall not exceed 230 tons/year, based upon a rolling, 12-month summation:

K003, K004, P006, P007, P012, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P029, P030, P031, P032, P033, P037, P038, P040, P042, P043, P044, P045, P046, P048, P049, P051, P066, P068, P069, P070, P071, P072, P073 and P074.

b) The permittee shall maintain monthly records of the following information for the emissions units listed above:

(1) The total VOC emissions during the rolling, 12-month period, calculated by adding emissions for the present month to the preceding 11 months of operation for each emissions unit, in tons. Monthly emissions shall be calculated in accordance with Section C of this permit.

c) The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the rolling, 12-month VOC emission limitation for this facility.

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

3. The following operations at this facility are subject to OAC rule 3745-21-25: Compression/injection molding, Sheet molding compound (SMC) manufacturing, Bulk molding compound (BMC) manufacturing, mixing, 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.

If the combined VOC emissions from SMC manufacturing (P007, P066, & P070), BMC manufacturing and mixing (P029, P040, P043, P044, P045 & P048) ever equal or exceed 100 tons/year, these emissions units shall be subject to the VOC control requirements listed in OAC rule 3745-21-21(D)(3).

a) Additional Terms and Conditions

(1) The permittee shall meet the work practice standards in Table 1 of this rule for the affected operations:

Type of Operation	Work Practice Standards
Compression molding	The work practice standards pursuant to this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4



Cleaning operation (cleaning of equipment used in reinforced plastic composites manufacture)	Do not use cleaning solvents (cleaners) that have a VOC content greater than 0.42 lb/gal, except cleaners used in closed systems and cleaners used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
VOC-containing materials storage operation	Keep containers that store VOC-containing materials closed or covered except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety.
SMC manufacturing operations	The work practice standards pursuant to this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4
All mixing or BMC manufacturing operations	The work practice standards pursuant to this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4

(2) The permittee has accepted a federally enforceable limit to demonstrate VOC emissions will remain below 230 tons/year.

b) **Monitoring and Record Keeping Requirements**

- (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 supporting documentation; and
  - b. a certified statement that operations are in compliance with the work practice standards specified in Table 1 of this rule.
- (2) The permittee shall retain the records required by this rule for a period of not less than 5 years. These records shall be made available to the director or any authorized representative of the director for review during normal business hours.

c) **Reporting Requirements**

- (1) The permittee shall submit semi-annual compliance reports containing the following information:
  - a. If there were no deviations from any VOC emission limitations, operating limits and/or work practice standards in Table 1 of this rule, a statement that there were no deviations during the reporting period;
  - b. For each deviation from any VOC emission limitations, operating limits, and/or work practice standards, the compliance report shall contain:



- i. the total operating time of each affected operation during the reporting period; and
  - ii. information on the number, duration, and cause of deviations (including unknown cause, if applicable) and the corrective actions taken.
- (2) The permittee shall report any exceedance of the 100 tons/year VOC emissions threshold listed in B.3.
- (3) These reports shall be submitted in accordance with the reporting requirements outlined in the Standard Terms and Conditions in section A of this permit.

4. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production: P006, P007, P012, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P029, P030, P031, P032, P033, P037, P038, P040, P042, P043, P044, P045, P046, P048, P049, P051, P066, P068, P069, P070, P071, P072 and P074. The complete MACT requirements including the MACT General Provisions may be access via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northeast District office.

a) 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 Part 63, Subpart WWWW]

b) Additional Terms and Conditions

(1) The permittee shall comply with all applicable provisions required under 40 CFR Part 63, Subpart WWWW, including but not limited to the following sections:

63.5790(b) & (c)	Applicability and affected sources
63.5835(a)	General Compliance Requirements
63.5900(a)(4), & (b)	Continuous Compliance Requirements

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

c) Operational Restrictions

(1) The permittee shall comply with all applicable provisions under 40 CFR Part 63, Subpart WWWW, including the following sections:

63.5805(b); and Table 4, 1-8	Work Practice Standards
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[Authority for term: 40 CFR Part 63, Subpart WWWW]



d) Monitoring and Record Keeping Requirements

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

63.5915(a)(1) &(d)	Notifications & Compliance Statements
63.5920	Record Retention

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

e) Reporting Requirements

- (1) The permittee shall submit the following reports to the Ohio EPA Northeast District Office, as required by 40 CFR Part 63, Subpart WWWW, within the time periods specified in each section.

63.5910(a)	Reporting Requirements
63.5910(b)(3)-(5)	Report Submission
63.5910(c)(1), (2), (3), & (5)	Required Information
63.5910(f)	Exceedance Reports
63.5910(g)	Deviation Reports

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

5. The following emissions units 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: K003, and K004. The complete MACT requirements including the MACT General Provisions may be access via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northeast District office.

- a) 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 Part 63, Subpart PPPP]



b) Additional Terms and Conditions

- (1) The permittee shall comply with all applicable provisions required under 40 CFR 63, Subpart PPPP, including the following sections:

63.4482(a), (b)(1)-(4), & (e)	Applicability and affected sources
63.4490(b)(1)	0.16 lb organic HAP/lb coating solids
63.4500(a)(1) & (b)	General Compliance Requirements
63.4542(a)-(c)	Continuous Compliance Requirements
63.4491(a) or (b)	Compliant Material or Emission Rate Without Add-on Controls Option

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

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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

63.4530(a)	Record Keeping
63.4530(b)	MSDS, formulation data, supplier information
63.4530(c)	Calculations
63.4530(d)	Material identification
63.4530(e) & (f)	Mass fraction of organic HAP, coating solids
63.4530(h)	Deviations

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

e) Reporting Requirements

- (1) The permittee shall submit the following reports to the Ohio EPA Northeast District Office, as required by 40 CFR Part 63, Subpart PPPP, within the time periods specified in each section.

63.4510(a)	Notifications
63.4520(a)(1), (2) & (3)	Semi-annual Compliance Reports
63.4520(a)(4), (5) & (6)	Deviation Reports
63.4531(a)-(c)	Record Retention

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



**Draft Permit-to-Install**  
MFG, Composite Systems  
**Permit Number:** P0110952  
**Facility ID:** 0204010230  
**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. Emissions Unit Group – Front Line Coating Booths - K003, K004**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K003	Prime coat spray booth w/particulate filters and 2.5 mmbtu/hr drying oven
K004	Top coat spray booth w/particulate filters and 3.0 mmbtu/hr drying oven

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)	Volatile organic compound (VOC) emissions from all coatings and cleanup materials from each coating booth shall not exceed 14 lbs/hr and 40.1 tpy
b.	OAC rule 3745-31-05(D) Synthetic Minor Restriction on Potential to Emit to avoid PSD on future projects.	See Facility-Wide Terms & Conditions Sections B.2.a), B.2.b) and B.2.c).
c.	OAC rule 3745-17-11(C)	See c)(1) and c)(2).
d.	40 CFR Part 63, Subpart PPPP	See Facility-Wide Terms & Conditions Section B.5.

(2) Additional Terms and Conditions

a. The hourly emission limitation for VOC is based on the uncontrolled potential to emit (PTE) for these emissions units, therefore, no monitoring or record keeping is required to document compliance with the emission limitations.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever these emission units are 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.



- (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.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each month for each coating booth:
    - a. the name and identification of each coating and cleanup material;
    - b. the number of gallons of each coating and cleanup material employed;
    - c. the VOC content of each coating and cleanup material, in lbs/gal, as applied;
    - d. the amount of cleanup material recovered, in lbs;
    - e. the total monthly VOC emissions from all coatings and cleanup materials employed, in lbs {sum of (b x c)-d}; and
    - f. the total annual VOC emissions from all coatings and cleanup materials.
  - (2) 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 Ohio EPA Northeast District Office upon request.
  - (3) 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.
  - (4) 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.
  - (5) 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 Ohio EPA Northeast District Office upon request.

- (6) 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.

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify 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.

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

- (3) The permittee shall submit annual reports that specify the total VOC emissions for this emissions unit for the previous calendar year. These reports shall be submitted by January 31<sup>st</sup> of each year.

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 all coatings and cleanup materials from each coating booth shall not exceed 14 lbs/hr and 40.1 tpy



Applicable Compliance Method:

The short term emission limitation reflects the uncontrolled PTE and was derived by multiplying the maximum VOC content by the maximum coating usage:

$$\text{lbs/hr} = (4.0 \text{ lbs VOC/gal})(3.5 \text{ gals/hr})$$

Compliance with the annual emission limitation shall be demonstrated by the record keeping and reporting requirements specified in d) and e).

- g) Miscellaneous Requirements
  - (1) None.



**2. Emissions Unit Group – SMC Machines: P007, P066, and P070**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P007	Sheet molding compound machine 1
P066	Sheet molding compound machine 2 (Research Facility)
P070	SMC Machine 3, carbon fiber mold machine (Research Facility)

- 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)	VOC emissions shall not exceed the following:  P007: 3.0 lbs/hr and 9.9 tpy; P066: 2.04 lbs/hr and 8.93 tpy; and P070: 3.77 lbs/hr and 9.9 tpy.
b.	OAC rule 3745-31-05(D) Synthetic Minor Restriction on Potential to Emit to avoid PSD on future projects.	See Facility-Wide Terms & Conditions Section B.2.
c.	OAC rule 3745-21-25(D)(1)	The work practice standards pursuant to this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4  See Facility-Wide Terms and Conditions Sections B.3 and B.4.
d.	OAC rule 3745-21-25(D)(8)	Exempt. VOC emissions are less than 25.0 tons per rolling, 12-month period.
e.	40 CFR Part 63, Subpart WWWW	See Facility-Wide Terms & Conditions Section B.4.



- (2) Additional Terms and Conditions
  - a. The hourly emission limitation for VOC is based on the uncontrolled potential to emit (PTE) for each emissions unit, therefore, no monitoring or record keeping is required to document compliance with this emission limitation.
- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall collect and record the following information each month for each emissions unit:
    - a. the name and identification of each SMC produced;
    - b. the amount of each SMC produced for each type of SMC product, in lbs;
    - c. the VOC/monomer content of each SMC employed, in percent by weight;
    - d. the monthly operating hours; and
    - e. the monthly VOC emissions, in tons (calculated by multiplying the hourly emission rate (b)(1)a) by the actual operating hours and the conversion factor (1 ton/2,000 lbs)
- e) Reporting Requirements
  - (1) 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.
  - (2) The permittee shall submit annual reports that specify the total VOC emissions for each emissions unit for the previous calendar year. These reports shall be submitted by January 31<sup>st</sup> of each year.
- 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 shall not exceed:  
3.0 lbs/hr and 9.9 tpy from P007;



2.04 lbs/hr and 8.93 tpy from P066; and

3.77 lbs/hr and 9.9 tpy from P070.

Applicable Compliance Method:

The hourly emission rate for P007 was established during emission testing conducted September 12-14, 2006, in accordance with 40 CFR Part 60, Appendix A, Methods 25A and 204.

The hourly emission rates for P066 and P070 were determined using the open line area (A, ft<sup>2</sup>) for each machine and the "American National Standard for Estimating Emission Factors from Open Molding Composite Processes and Other Composite Processes," equation for SMC production (ANSI/ACMA/ICPA UEF-1-2011a):

$$\text{lbs/hr} = 0.1457(A) - 0.1454$$

Compliance with the annual limitation for each emissions unit shall be demonstrated by the record keeping and reporting requirements specified in d) and e).

g) Miscellaneous Requirements

- (1) None.



**3. Emissions Unit Group - Mixers: P029, P040, P043, P044, P045, P048**

EU ID	Operations, Property and/or Equipment Description
P029	Mixer 3: SMC paste production, vented to baghouse
P040	Mixer 4: Nano mixer, vented to baghouse
P043	Mixer 6: SMC paste production, vented to baghouse
P044	Mixer 7: liquid molding compound (wet mix), vented to baghouse
P045	Mixer 8: liquid molding compound (wet mix), vented to baghouse
P048	Bead Blender vented to baghouse

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)	Volatile organic compound (VOC) emissions from each mixer shall not exceed 0.95 lb/hr and 4.16 tons/year.  Particulate emissions (PE) from each mixer shall not exceed 0.12 lb/hr.  Visible particulate emissions from the baghouse exhaust shall not exceed 5% opacity, as a 6-minute average.  See b)(2)a and b)(2)b.
b.	OAC rule 3745-31-05(D) Synthetic Minor Restriction on Potential to Emit to avoid PSD on future projects.	See Facility-Wide Terms & Conditions Section B.2.
c.	OAC rule 3745-21-25(D)(1)	The work practice standards pursuant to this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See Facility-Wide Terms and Conditions Sections B.3 and B.4.
d.	OAC rule 3745-17-07(A)(1)	The visible particulate emission limitation required by this applicable rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	40 CFR Part 63, Subpart WWWW	See Facility-Wide Terms & Conditions Section B.4.

(2) Additional Terms and Conditions

- a. The emissions from these emissions units shall be vented to the baghouse during the addition of filler material into the mix vessel.
- b. The hourly emission limitations for VOC and PE are based on the potential to emit (PTE) for these emissions units, therefore, no monitoring or record keeping is required to document compliance with the emission limitations.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information monthly for each mixer:
  - a. the company identification for each material used in the mixers;
  - b. the number of pounds of each material used;
  - c. the dry solids content of each material, expressed as a decimal fraction, by weight;
  - d. the total particulate emission rate, in lbs (as calculated in section f)(1)b);
  - e. the VOC/monomer content of each material, expressed as a decimal fraction, by weight;
  - f. the total VOC emission rate for each mixer, in lbs (as calculated in section f)(1)a); and
  - g. the total annual VOC emission rate for each mixer, in tons/year.



- (2) The pressure drop across the baghouse shall be maintained within the range recommended by the manufacturer while the emissions units are in operation or within a range established during the most recent performance test that demonstrated the emissions units were in compliance.
- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

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

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

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

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

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



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

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
  - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

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

- (3) The permittee shall submit annual reports that specify the total VOC emissions for this emissions unit for the previous calendar year. These reports shall be submitted by January 31<sup>st</sup> of each year.

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 each mixer shall not exceed 0.95 lb/hr and 4.16 tons/year.

Applicable Compliance Method:

The hourly emission limitation reflects the uncontrolled potential to emit and was derived by multiplying the maximum mix rate (lbs/hr) by the VOC/monomer content (% by weight) and the emission factor (lb VOC/lb available VOC) developed during the 6/19/2007 stack test on mixer 8:

$$\text{lb/hr} = (4,000 \text{ lbs/hr})(25\%)(0.00095 \text{ lb VOC/lb})$$

Compliance with the annual emission limitation shall be demonstrated by the record keeping and reporting requirements specified in d) and e).

If required, compliance with these emission limitations shall be demonstrated by emissions tests performed in accordance with 40 CFR Part 60, Appendix A, Method(s) 25A or 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method approved by the Ohio EPA.

b. Emission Limitation:

PE from each mixer shall not exceed 0.12 lb/hr.

Applicable Compliance Method:

The hourly emission limitation reflects the potential to emit and was derived by multiplying the maximum dry solids throughput rate (lbs/hr) by the percent dry solids/mix(%), by the emission factor for uncontrolled PE for a semi-covered or covered mixer (AP 42, Chapter 6.4 (5/83)), and the baghouse control efficiency:

$$\text{lb/hr} = (4,000 \text{ lbs/hr})(30\%)(0.01 \text{ lbs PE/lb dry solids})(1 - 0.99)$$

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

c. Emission Limitation:

Visible particulate emissions from the baghouse exhaust shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.



**Draft Permit-to-Install**  
MFG, Composite Systems  
**Permit Number:** P0110952  
**Facility ID:** 0204010230

**Effective Date:** To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



**Effective Date:** To be entered upon final issuance

**4. Emissions Unit Group – Compression Mold Presses: Group 1 - P022, P023; Group 2 - P020, P021, P071, P072; Group 3 - P016, P017, P018, P024, P038, P069; Group 4 - P032, P037, P046, P051, P074; Group 5 - P019, P030; Group 6 - P014, P015; Group 7 - P006, P012, P042, P068; and Group 8 - P031, P033, P049**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>	<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P006	2000 ton press 225	P020	450 ton press 207
P012	1500 ton press 227	P021	450 ton press 208
P042	2000 ton press 224	P071	Press 19 --from Premier Molding
P068	2000 ton press 5 (Research Facility)	P072	Press 22 (P016) from Premier Molding
P014	1500 ton press 222	P022	220 ton press 204
P015	1500 ton press 221	P023	220 ton press 205
P016	880 ton press 202	P031	2850 ton press 228
P017	565 ton press 201	P033	2850 ton press 229
P018	565 ton press 203	P049	1000 ton press 238
P024	227 ton press 219	P032	1500 ton press 231
P038	500 ton press 209	P037	1000 ton press 233
P069	500 ton press (Research Facility)	P046	2800 ton press 210
P019	450 ton press 206	P051	1000 ton press 239
P030	1500 ton press 226	P074	500 ton press 240

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.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3)	VOC emissions shall not exceed the following from each press within each group:  Group 1 presses: 0.45 lb/hr and 1.97 tpy; Group 2 presses: 0.71 lb/hr and 3.09 tpy; Group 3 presses: 0.81 lb/hr and 3.55 tpy; Group 4 presses: 1.10 lbs/hr and 4.80 tpy; Group 5 presses: 1.43 lbs/hr and 6.24 tpy;



**Effective Date:** To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Group 6 presses: 1.70 lbs/hr and 7.42 tpy; Group 7 presses: 2.24 lbs/hr and 9.79 tpy; and Group 8 presses: 3.48 lbs/hr and 15.24 tpy.
b.	OAC rule 3745-31-05(D) Synthetic Minor Restriction on Potential to Emit to avoid PSD on future projects.	See Facility-Wide Terms & Conditions Sections B.2.a), B.2.b) and B.2.c).
c.	OAC rule 3745-21-25(D)(1)	The work practice standards pursuant to this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4  See Facility-Wide Terms and Conditions Sections B.3 and B.4.
d.	40 CFR Part 63, Subpart WWWW	See Facility-Wide Terms & Conditions Section B.3.

(2) Additional Terms and Conditions

- a. The hourly emission limitation for VOC is based on the uncontrolled potential to emit (PTE) for these emissions units, therefore, no monitoring or record keeping is required to document compliance with this limitation.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information monthly for each press:
  - a. the name and identification of each sheet mold compound (SMC) and each liquid mold compound (LCM) used;
  - b. the amount of each SMC employed, in lbs;
  - c. the amount of each LCM employed, in lbs;
  - d. the VOC/monomer content of each SMC employed, expressed as a decimal fraction, by weight;
  - e. the VOC/monomer content of each LCM employed, expressed as a decimal fraction, by weight;
  - f. the total VOC emission rate for each press, in lbs  $\{c \times ((0.0072 \times e) - 0.0008)\} + (b \times d \times 0.015)$ ; and



g. the total annual VOC emission rate for each press, in tons/year.

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall submit annual reports that specify the total VOC emissions for each press for the previous calendar year. These reports shall be submitted by January 31<sup>st</sup> of each year.

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 shall not exceed the following from each press within each group

Group 1 presses: 0.45 lb/hr and 1.97 tpy;  
Group 2 presses: 0.71 lb/hr and 3.09 tpy;  
Group 3 presses: 0.81 lb/hr and 3.55 tpy;  
Group 4 presses: 1.10 lbs/hr and 4.80 tpy;  
Group 5 presses: 1.43 lbs/hr and 6.24 tpy;  
Group 6 presses: 1.70 lbs/hr and 7.42 tpy;  
Group 7 presses: 2.24 lbs/hr and 9.79 tpy; and  
Group 8 presses: 3.48 lbs/hr and 15.24 tpy.

Applicable Compliance Method:

The hourly emission limitations reflect the uncontrolled potential to emit and were derived by multiplying the worst case throughput (lbs monomer molder/hour) by the the "American National Standard for Estimating Emission Factors from Open Molding Composite Processes and Other Composite Processes," unified emission factor (UEF) for compression molding of SMC, 1.5% of the styrene monomer content in the SMC material. (ANSI/ACMA/ICPA UEF-1-2011a);

Group 1: (30 lbs/hr)(0.015) = 0.45 lb/hr;  
Group 2: (47 lbs/hr)(0.015) = 0.71 lb/hr;  
Group 3: (54 lbs/hr)(0.015) = 0.81 lb/hr;  
Group 4: (73 lbs/hr)(0.015) = 1.10 lbs/hr;  
Group 5: (95 lbs/hr)(0.015) = 1.43 lbs/hr;  
Group 6: (113 lbs/hr)(0.015) = 1.70 lbs/hr;



Group 7:  $(149 \text{ lbs/hr})(0.015) = 2.24 \text{ lbs/hr}$ ; and  
Group 8:  $(232 \text{ lbs/hr})(0.015) = 3.48 \text{ lbs/hr}$ .

Compliance with the annual emission limitation shall be demonstrated by the record keeping and reporting requirements specified in d) and e).

g) Miscellaneous Requirements

(1) None.



5. P073, Parts preparation/inspection

Operations, Property and/or Equipment Description:

Parts preparation/inspection

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)	Volatile organic compound (VOC) emissions shall not exceed 5.0 lbs/hr and 21.9 tpy.
b.	OAC rule 3745-31-05(D) Synthetic Minor Restriction on Potential to Emit to avoid PSD on future projects.	See Facility-Wide Terms & Conditions Sections B.2.a), B.2.b) and B.2.c).
c.	40 CFR Part 63, Subpart WWWW	See Facility-Wide Terms & Conditions Sections B.4.a), B.4.b), B.4.c), B.4.d) and B.4.e).

(2) Additional Terms and Conditions

a. The hourly emission limitation for VOC is based on the uncontrolled potential to emit (PTE) for these emissions units, therefore, no monitoring or record keeping is required to document compliance with this limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month:

a. the company identification of each solvent employed;

b. the amount of each solvent used, in gallons;



- c. the VOC content of each solvent used, in lbs/gallon; and
- d. the total monthly VOC emissions (b x c) from all solvents used, in lbs.

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall submit annual reports that specify the total VOC emissions for this emissions unit for the previous calendar year. These reports shall be submitted by January 31<sup>st</sup> of each year.

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 shall not exceed 5.0 lbs/hour and 21.9 tpy.

Applicable Compliance Method:

Compliance with these emission limitations shall be demonstrated by the record keeping and reporting requirements specified in d) and e).

g) Miscellaneous Requirements

- (1) None.