State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

12/26/02

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

02-04-01-0112
Iten Industries, Inc. - Plant 1
Rick O Fortune
PO Box 2150
Ashtabula, OH 44005

Dear Rick O Fortune:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: Northeast District Office
File, DAPC PMU

State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: **12/26/02**	Effective Date: **01/16/02**	Expiration Date: **12/26/07**

This document constitutes issuance of a Title V permit for Facility ID: 02-04-01-0112 to:
Iten Industries, Inc. - Plant 1
4001 Benefit Ave
Ashtabula, OH 44005

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

K001 (Treater # 2)
Egan treater for paper and fabric coating with phenolic and epoxy resins

K002 (Treater #1)
Eagan treater for paper and fabric coating with phenolic and epoxy resins

K003 (Treater # 3)
Epoxy and phenolic resin coating of paper and fabric

K004 (Treater # 4)
Epoxy and melomine coating of fiberglass fabric

P003 (Phenolic Resin Mixing)
Phenolic resin and epoxy resin mixing for use at treaters

P006 (Politen mixer)
Politen mixing from polyester resin and fillers for compression molding

P013 (Compression Press A)
Compression molding flat sheet from polyester resin and fiberglass and fillers

P014 (Compression Press B)
Compression molding flat sheet from polyester resin and fiberglass and fillers

P015 (Compression Press C)
Compression molding flat sheet from polyester resin and fiberglass and fillers

P016 (Compression Press D)
Compression molding flat sheet from polyester resin and fiberglass and fillers

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. 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. 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, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. 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:

i. The date, place (as defined in the permit), and time of sampling or measurements.
ii. The date(s) analyses were performed.
iii. The company or entity that performed the analyses.
iv. The analytical techniques or methods used.
v. The results of such analyses.
vi. 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:

i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

ii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) with respect to emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

(a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations ; (ii) the probable cause of such deviations; and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, the written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters. 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. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six

months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) ,(ii) and (iii))

(b) 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 deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement 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. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.

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

iii. **For monitoring, record keeping, and reporting requirements:**

Written reports that identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year, for the previous six calendar months. 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. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. 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.

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

iv. 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))

2. 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 unit(s) 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 OAC rule 3745-15-06, 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).
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

3. 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.
(Authority for term: OAC rule 3745-77-07(A)(4))

4. 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))

5. 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))

6. 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 A.10 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.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. 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))

8. 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))

9. 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 general terms and conditions shall apply to all operating scenarios authorized in this permit.

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

10. 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))

11. 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))

12. 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:

i. 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.

ii. 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.

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

iv. 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:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
ii. 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:

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

13. 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))

14. 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))

15. 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))

16. 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 emission 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.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)
(Authority for term: OAC rule 3745-77-07(I))

17. 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.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. 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))

20. 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))

B. *State Only Enforceable Section*

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee

shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., 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.)

2. Records Retention Requirements

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.

3. 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.

4. 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).

5. 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.

6. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

B002 Process heat 7 mmBTU/hr natural gas boiler
B004 Process heat 5.2 mmBTU/hr natural gas boiler
B005 Process heat 7.3 mmBTU/hr natural gas boiler
B006 Process heat 7.3 mmBTU/hr natural gas boiler
P005 0.5 mmBtu/hr natural gas Grieve Corp. drying oven
P008 Dust collector for cut off saw and trim saw
T005 Polyester resin AGST 4,500-gallon tank
T006 Polyester resin AGST 9,000-gallon tank
T010 Epoxy resin AGST 4,500-gallon tank
T011 Epoxy resin AGST 4,500-gallon tank
T013 UST 15,000-gallon tank for phenolic resin storage
T014 UST 15,000-gallon tank for phenolic resin storage
T015 UST 7,500-gallon tank for storage of non VOC plastizer
T016 UST 7,500-gallon tank for storage of phenolic resin
T017 UST 7,500-gallon tank for methanol storage
T018 UST 7,500-gallon tank for methanol storage
T019 UST 7,500-gallon tank for phenolic resin storage
T020 UST 7,500-gallon tank for phenolic resin storage

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Treater # 2 (K001)

Activity Description: Egan treater for paper and fabric coating with phenolic and epoxy resins

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Treater #2 controlled by a thermal oxidizer	OAC rule 3745-21-09(B)(6)	See Section A.I.2.a.
	40 CFR 63 Subpart JJJJ	See Section A.I.2.b.

2. Additional Terms and Conditions

2.a In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraphs (F) and (G) of OAC rule 3745-21-09, the permittee shall comply with the provisions of OAC rule 3745-21-09(B)(6) for this emissions unit. The permittee shall operate and maintain an incineration system capable of capturing and controlling the VOC emissions from emissions units K001, K002, K003, K004, and P003.

The overall control efficiency for VOC for emissions units K001, K002, K003 and K004 shall not be less than 81%, by weight, and for emissions unit P003, not less than 85%, by weight. In addition, the thermal oxidizer shall provide a destruction efficiency of not less than 90%, by weight, for the VOC emissions vented to the control equipment.

2.b On September 13, 2000, U.S.EPA proposed the National Emission Standards for Hazardous Air Pollutants (NESHAP) for suface coating of Paper and Other Webs, at 40 CFR, Part 63, Subpart JJJJ. When the NESHAP is promulgated, the facility will be subject to the rules as an existing major source with a compliance date as specified in the NESHAP. See Sections A.IV.4, A.IV.5 and A.IV.6 for required reporting pertaining to these requirements.

II. Operational Restrictions

1. To comply with OAC rule 3745-21-09(B)(6), the thermal oxidizer shall be operated at all times when this emissions unit is in operation.

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

3. All ventilation fans associated with this emissions unit and the thermal oxidizer shall be in operation at all times when this emissions unit is in operation.

II. Operational Restrictions (continued)

4. When employing the thermal oxidizer, all bypass dampers, actuator pins, and associated motors shall be in the correct position and in good operating condition at all times when this emissions unit is in operation to ensure that all captured VOC emissions are vented to the thermal oxidizer. Also, all the hooding and ductwork comprising the VOC emission capture system for this emissions unit shall be free of leaks and holes that would permit the escape of the captured VOC emissions.

5. The average, total exhaust flow rate from this emissions unit to the thermal oxidizer shall not be less than the level determined during the last emission tests that demonstrated compliance with the overall control efficiency for VOC for emissions units K001, K002, K003, K004 and P003. The average, total exhaust flow rate will be determined by the same method used during the last emission test.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emission unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day for the control equipment:

2.a A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

2.b All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degress Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

3. The permittee shall perform an inspection of the thermal oxidizer on at least an annual basis. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations and shall include a physical inspection of the unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment shall be performed as determined by the inspection.

4. The permittee shall maintain a record of the results of each annual inspection of the thermal oxidizer.

5. On an annual basis, the permittee shall inspect the electronics of the thermal oxidizer interlock system used for this emissions unit to verify that the signals between the thermal oxidizer and the emissions unit are functioning properly. The permittee shall document the results of all annual inspections. An excursion is defined as a finding that an interlock is inoperative. Any excursion shall require that the process line be immediately shut down and remain shut down until the problem has been corrected.

III. Monitoring and/or Record Keeping Requirements (continued)

6. Except as noted below, each calendar quarter, the permittee shall utilize an anemometer, or any other equivalent measurement method approved by the Ohio EPA, to measure the average, total exhaust flow rate from this emissions unit to the thermal oxidizer, in scfm. The anemometer, or other equivalent measurement method approved by the Ohio EPA, shall be capable of accurately measuring the desired parameter and shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The measurements shall be taken while this emissions unit and all other treaters at the facility are in a normal mode of operation. The permittee shall maintain records of the results of all exhaust flow rate measurements.

If the total exhaust flow rate measurements for four consecutive quarters do not identify a deviation of the applicable operational restriction, the permittee may perform the total exhaust flow rate measurements on a semiannual basis. Should the total exhaust flow rate measurements taken on a semiannual basis identify a deviation of the applicable operational restriction, the permittee shall revert to quarterly measurements.

7. Each calendar month, the permittee shall inspect the operational condition and integrity of the each ventilation fan comprising the capture system. Ventilation fan observations shall include visual inspections of the fan wheel, belts, and bearings. Lubrication of bearings and replacement of parts shall occur as necessary. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

8. Each calendar month, the permittee shall inspect the operational condition and integrity of all hooding, ductwork, and bypass dampers comprising the capture system. Hooding and ductwork observations shall include visual inspections for leaks or holes. Bypass damper observations shall include visual inspections to verify that the damper setting is in the correct position (i.e., to oxidizer or to atmosphere) and visual inspections of the actuator and motor to verify that the actuator pin and the motor are operating properly. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:

1.a A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

1.b All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

1.c These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31 and shall cover the records for the previous calendar quarters.

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

a. each time the interlock system stops the operation of this emissions unit because the thermal oxidizer is not in operation;

b. each average, total exhaust flow rate measurement that does not comply with the operational restriction specified in Section A.II.5, based on the records maintained pursuant to Section A.III.6 of these terms and conditions, and the magnitude of each deviation; and

c. each time any bypass dampers, actuator pins, and/or associated motors are not in the correct position and in good operating condition and/or any of the hooding or ductwork comprising the VOC emission capture system contains leaks or holes that would permit the escape of the captured VOC emissions.

3. The permittee shall submit annual reports that specify the results of each annual inspection of the electronics of the ventilation fan interlock systems and the thermal oxidizer interlock systems, based on the records maintained pursuant to Section A.III.5 of these terms and conditions.

IV. Reporting Requirements (continued)

4. The permittee will be subject to the proposed National Emission Standards for Hazardous Air Pollutants (NESHAP) for surface coating of Paper and Other Webs, 40 CFR, Part 63, Subpart JJJJ. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts: The deadline to submit the Part I application as specified in 40 CFR Part 63.53 was May 15, 2002.

5.a If the final MACT Standard is not promulgated by the deadline specified by U.S.EPA, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted within 60 days after the deadline to promulgate the respective standard, as specified by the settlement between U.S.EPA and Sierra Club. It must contain the information in paragraphs (i) through (vi) of this section.

i. For a new affected source, the anticipated date of startup of operation.

ii. The hazardous air pollutants emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for hazardous air pollutants from the affected source.

iii. Any existing federal, State, or local limitations or requirements applicable to the affected source.

iv. For each affected emission point or group of affected emission points, an identification of control technology in place.

v. Information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor.

vi. Any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to subpart A of 40 CFR Part 63.

5.b The Part II application for a MACT determination may, but is not required to, contain the following information:

i. Recommended emission limitations for the affected source and support information. The permittee may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation.

ii. A description of the control technologies that would be applied to meet the emission limitation including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied.

iii. Relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.

6. If the NESHAP is promulgated before May 15, 2004, the facility will be subject as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the Subpart, the permittee shall submit the following notifications:

IV. Reporting Requirements (continued)

6.a Within 120 days after promulgation of 40 CFR, Part 63, Subpart JJJJ, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standards. If the permittee is subject to the final standards, the following information shall also be included in the Initial Notification Report, in accordance with 40 CFR Part 63.9(b)(2):

i. the name and mailing address of the permittee;

ii. the physical location of the source if it is different from the mailing address;

iii. identification of the relevant MACT standards and the permittee's compliance date;

iv. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and

v. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.

6.b Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR, Part 63, Subpart JJJJ, the permittee shall submit a notification of compliance status that contains the following information:

i. the methods used to determine compliance;

ii. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

iv. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR, Part 63, Subpart JJJJ.

v. an analysis demonstrating whether the affected source is a major source or an area source;

vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and

vii. a statement of whether or not the permittee has complied with the requirements of 40 CFR, Part 63, Subpart JJJJ.

V. Testing Requirements

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

1.a The emission testing shall be conducted within 3 months after permit issuance and within 6 months prior to permit expiration.

1.b The emission testing shall be conducted to demonstrate compliance with OAC rule 3745-21-09(B)(6). Specifically, testing shall demonstrate an 81% overall reduction of organic compounds emitted by the emissions unit and a 90% destruction of the organic compounds that enter the thermal oxidizer.

V. Testing Requirements (continued)

1.c The following test method(s) shall be employed to demonstrate compliance with the organic compound reduction and destruction requirements:

Method 25 of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the inlet and outlet are greater than 50 ppm; or

Method 25A of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the inlet and outlet are less than 50 ppm; and

Methods 204 through Method 204F of 40 CFR Part 51, Appendix M.

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

1.d The tests shall be conducted while the emissions units K001, K002, K003, K004 and P003 are operating at or near their maximum capacities, unless otherwise specified or approved by the Northeast District Office of the Ohio EPA.

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

The control or destruction efficiency defined as the percent reduction of mass emissions between the inlet and outlet of the control system shall be determined in accordance with the test methods and prodedures specified in Ohio Administrative Code 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Treater #1 (K002)

Activity Description: Eagan treater for paper and fabric coating with phenolic and epoxy resins

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Treater #1 controlled by a thermal oxidizer	OAC rule 3745-21-09(B)(6)	See Section A.I.2.a.
	40 CFR 63 Subpart JJJJ	See Section A.I.2.b.

2. Additional Terms and Conditions

2.a In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraphs (F) and (G) of OAC rule 3745-21-09, the permittee shall comply with the provisions of OAC rule 3745-21-09(B)(6) for this emissions unit. The permittee shall operate and maintain an incineration system capable of capturing and controlling the VOC emissions from emissions units K001, K002, K003, K004, and P003.

The overall control efficiency for VOC for emissions units K001, K002, K003 and K004 shall not be less than 81%, by weight, and for emissions unit P003, not less than 85%, by weight. In addition, the thermal oxidizer shall provide a destruction efficiency of not less than 90%, by weight, for the VOC emissions vented to the control equipment.

2.b On September 13, 2000, U.S.EPA proposed the National Emission Standards for Hazardous Air Pollutants (NESHAP) for suface coating of Paper and Other Webs, at 40 CFR, Part 63, Subpart JJJJ. When the NESHAP is promulgated, the facility will be subject to the rules as an existing major source with a compliance date as specified in the NESHAP. See Sections A.IV.4, A.IV.5 and A.IV.6 for required reporting pertaining to these requirements.

II. Operational Restrictions

1. To comply with OAC rule 3745-21-09(B)(6), the thermal oxidizer shall be operated at all times when this emissions unit is in operation.

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

3. All ventilation fans associated with this emissions unit and the thermal oxidizer shall be in operation at all times when this emissions unit is in operation.

II. Operational Restrictions (continued)

4. When employing the thermal oxidizer, all bypass dampers, actuator pins, and associated motors shall be in the correct position and in good operating condition at all times when this emissions unit is in operation to ensure that all captured VOC emissions are vented to the thermal oxidizer. Also, all the hooding and ductwork comprising the VOC emission capture system for this emissions unit shall be free of leaks and holes that would permit the escape of the captured VOC emissions.

5. The average, total exhaust flow rate from this emissions unit to the thermal oxidizer shall not be less than the level determined during the last emission tests that demonstrated compliance with the overall control efficiency for VOC for emissions units K001, K002, K003, K004 and P003. The average, total exhaust flow rate will be determined by the same method used during the last emission test.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emission unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day for the control equipment:

2.a A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

2.b All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degress Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

3. The permittee shall perform an inspection of the thermal oxidizer on at least an annual basis. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations and shall include a physical inspection of the unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment shall be performed as determined by the inspection.

4. The permittee shall maintain a record of the results of each annual inspection of the thermal oxidizer.

5. On an annual basis, the permittee shall inspect the electronics of the thermal oxidizer interlock system used for this emissions unit to verify that the signals between the thermal oxidizer and the emissions unit are functioning properly. The permittee shall document the results of all annual inspections. An excursion is defined as a finding that an interlock is inoperative. Any excursion shall require that the process line be immediately shut down and remain shut down until the problem has been corrected.

6. Except as noted below, each calendar quarter, the permittee shall utilize an anemometer, or any other equivalent measurement method approved by the Ohio EPA, to measure the average, total exhaust flow rate from this emissions unit to the thermal oxidizer, in scfm. The anemometer, or other equivalent measurement method approved by the Ohio EPA, shall be capable of accurately measuring the desired parameter and shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The measurements shall be taken while this emissions unit and all other treaters at the facility are in a normal mode of operation. The permittee shall maintain records of the results of all exhaust flow rate measurements.

If the total exhaust flow rate measurements for four consecutive quarters do not identify a deviation of the applicable operational restriction, the permittee may perform the total exhaust flow rate measurements on a semiannual basis. Should the total exhaust flow rate measurements taken on a semiannual basis identify a deviation of the applicable operational restriction, the permittee shall revert to quarterly measurements.

III. Monitoring and/or Record Keeping Requirements (continued)

7. Each calendar month, the permittee shall inspect the operational condition and integrity of the each ventilation fan comprising the capture system. Ventilation fan observations shall include visual inspections of the fan wheel, belts, and bearings. Lubrication of bearings and replacement of parts shall occur as necessary. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

8. Each calendar month, the permittee shall inspect the operational condition and integrity of all hooding, ductwork, and bypass dampers comprising the capture system. Hooding and ductwork observations shall include visual inspections for leaks or holes. Bypass damper observations shall include visual inspections to verify that the damper setting is in the correct position (i.e., to oxidizer or to atmosphere) and visual inspections of the actuator and motor to verify that the actuator pin and the motor are operating properly. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:

1.a A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

1.b All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

1.c These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31 and shall cover the records for the previous calendar quarters.

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

a. each time the interlock system stops the operation of this emissions unit because the thermal oxidizer is not in operation;

b. each average, total exhaust flow rate measurement that does not comply with the operational restriction specified in Section A.II.5, based on the records maintained pursuant to Section A.III.6 of these terms and conditions, and the magnitude of each deviation; and

c. each time any bypass dampers, actuator pins, and/or associated motors are not in the correct position and in good operating condition and/or any of the hooding or ductwork comprising the VOC emission capture system contains leaks or holes that would permit the escape of the captured VOC emissions.

3. The permittee shall submit annual reports that specify the results of each annual inspection of the electronics of the ventilation fan interlock systems and the thermal oxidizer interlock systems, based on the records maintained pursuant to Section A.III.5 of these terms and conditions.

4. The permittee will be subject to the proposed National Emission Standards for Hazardous Air Pollutants (NESHAP) for surface coating of Paper and Other Webs, 40 CFR, Part 63, Subpart JJJJ. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts: The deadline to submit the Part I application as specified in 40 CFR Part 63.53 was May 15, 2002.

IV. Reporting Requirements (continued)

5.a If the final MACT Standard is not promulgated by the deadline specified by U.S.EPA, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted within 60 days after the deadline to promulgate the respective standard, as specified by the settlement between U.S.EPA and Sierra Club. It must contain the information in paragraphs (i) through (vi) of this section.

i. For a new affected source, the anticipated date of startup of operation.

ii. The hazardous air pollutants emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for hazardous air pollutants from the affected source.

iii. Any existing federal, State, or local limitations or requirements applicable to the affected source.

iv. For each affected emission point or group of affected emission points, an identification of control technology in place.

v. Information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor.

vi. Any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to subpart A of 40 CFR Part 63.

5.b The Part II application for a MACT determination may, but is not required to, contain the following information:

i. Recommended emission limitations for the affected source and support information. The permittee may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation.

ii. A description of the control technologies that would be applied to meet the emission limitation including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied.

iii. Relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.

6. If the NESHAP is promulgated before May 15, 2004, the facility will be subject as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the Subpart, the permittee shall submit the following notifications:

6.a Within 120 days after promulgation of 40 CFR, Part 63, Subpart JJJJ, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standards. If the permittee is subject to the final standards, the following information shall also be included in the Initial Notification Report, in accordance with 40 CFR Part 63.9(b)(2):

i. the name and mailing address of the permittee;

ii. the physical location of the source if it is different from the mailing address;

iii. identification of the relevant MACT standards and the permittee's compliance date;

iv. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and

v. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.

IV. Reporting Requirements (continued)

6.b Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR, Part 63, Subpart JJJJ, the permittee shall submit a notification of compliance status that contains the following information:

i. the methods used to determine compliance;

ii. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

iv. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR, Part 63, Subpart JJJJ.

v. an analysis demonstrating whether the affected source is a major source or an area source;

vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and

vii. a statement of whether or not the permittee has complied with the requirements of 40 CFR, Part 63, Subpart JJJJ.

V. Testing Requirements

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

1.a The emission testing shall be conducted within 3 months after permit issuance and within 6 months prior to permit expiration.

1.b The emission testing shall be conducted to demonstrate compliance with OAC rule 3745-21-09(B)(6). Specifically, testing shall demonstrate an 81% overall reduction of organic compounds emitted by the emissions unit and a 90% destruction of the organic compounds that enter the thermal oxidizer.

1.c The following test method(s) shall be employed to demonstrate compliance with the organic compound reduction and destruction requirements:

Method 25 of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the inlet and outlet are greater than 50 ppm; or

Method 25A of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the inlet and outlet are less than 50 ppm; and

Methods 204 through Method 204F of 40 CFR Part 51, Appendix M.

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

1.d The tests shall be conducted while the emissions units K001, K002, K003, K004 and P003 are operating at or near their maximum capacities, unless otherwise specified or approved by the Northeast District Office of the Ohio EPA.

V. Testing Requirements (continued)

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

The control or destruction efficiency defined as the percent reduction of mass emissions between the inlet and outlet of the control system shall be determined in accordance with the test methods and prodedures specified in Ohio Administrative Code 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Treater # 3 (K003)

Activity Description: Epoxy and phenolic resin coating of paper and fabric

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Treater #3 controlled by a thermal oxidizer	OAC rule 3745-21-09(B)(6)	See Section A.I.2.a.
	OAC rule 3745-31-05(A)(3) PTI No. 02-980	See Section A.I.2.b.
	40 CFR 63 Subpart JJJJ	See Section A.I.2.c.

2. Additional Terms and Conditions

2.a In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraphs (F) and (G) of OAC rule 3745-21-09, the permittee shall comply with the provisions of OAC rule 3745-21-09(B)(6) for this emissions unit. The permittee shall operate and maintain an incineration system capable of capturing and controlling the VOC emissions from emissions units K001, K002, K003, K004, and P003.

The overall control efficiency for VOC for emissions units K001, K002, K003 and K004 shall not be less than 81%, by weight, and for emissions unit P003, not less than 85%, by weight. In addition, the thermal oxidizer shall provide a destruction efficiency of not less than 90%, by weight, for the VOC emissions vented to the control equipment.

2.b The requirements of this rule are equilavent to the requirements of OAC rule 3745-21-09(B)(6).

2.c On September 13, 2000, U.S.EPA proposed the National Emission Standards for Hazardous Air Pollutants (NESHAP) for suface coating of Paper and Other Webs, at 40 CFR, Part 63, Subpart JJJJ. When the NESHAP is promulgated, the facility will be subject to the rules as an existing major source with a compliance date as specified in the NESHAP. See Sections A.IV.4, A.IV.5 and A.IV.6 for required reporting pertaining to these requirements.

II. Operational Restrictions

1. To comply with OAC rule 3745-21-09(B)(6), the thermal oxidizer shall be operated at all times when this emissions unit is in operation.

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

II. Operational Restrictions (continued)

3. All ventilation fans associated with this emissions unit and the thermal oxidizer shall be in operation at all times when this emissions unit is in operation.

4. When employing the thermal oxidizer, all bypass dampers, actuator pins, and associated motors shall be in the correct position and in good operating condition at all times when this emissions unit is in operation to ensure that all captured VOC emissions are vented to the thermal oxidizer. Also, all the hooding and ductwork comprising the VOC emission capture system for this emissions unit shall be free of leaks and holes that would permit the escape of the captured VOC emissions.

5. The average, total exhaust flow rate from this emissions unit to the thermal oxidizer shall not be less than the level determined during the last emission tests that demonstrated compliance with the overall control efficiency for VOC for emissions units K001, K002, K003, K004 and P003. The average, total exhaust flow rate will be determined by the same method used during the last emission test.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emission unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

2.a

A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

2.b All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizerr, when the emissions unit was in operation, was more than 50 degress Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

3. The permittee shall perform an inspection of the thermal oxidizer on at least an annual basis. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations and shall include a physical inspection of the unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment shall be performed as determined by the inspection.

4. The permittee shall maintain a record of the results of each annual inspection of the thermal oxidizer.

5. On an annual basis, the permittee shall inspect the electronics of the thermal oxidizer interlock system used for this emissions unit to verify that the signals between the thermal oxidizer and the emissions unit are functioning properly. The permittee shall document the results of all annual inspections. An excursion is defined as a finding that an interlock is inoperative. Any excursion shall require that the process line be immediately shut down and remain shut down until the problem has been corrected.

III. Monitoring and/or Record Keeping Requirements (continued)

6. Except as noted below, each calendar quarter, the permittee shall utilize an anemometer, or any other equivalent measurement method approved by the Ohio EPA, to measure the average, total exhaust flow rate from this emissions unit to the thermal oxidizer, in scfm. The anemometer, or other equivalent measurement method approved by the Ohio EPA, shall be capable of accurately measuring the desired parameter and shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The measurements shall be taken while this emissions unit and all other treaters at the facility are in a normal mode of operation. The permittee shall maintain records of the results of all exhaust flow rate measurements.

If the total exhaust flow rate measurements for four consecutive quarters do not identify a deviation of the applicable operational restriction, the permittee may perform the total exhaust flow rate measurements on a semiannual basis. Should the total exhaust flow rate measurements taken on a semiannual basis identify a deviation of the applicable operational restriction, the permittee shall revert to quarterly measurements.

7. Each calendar month, the permittee shall inspect the operational condition and integrity of the each ventilation fan comprising the capture system. Ventilation fan observations shall include visual inspections of the fan wheel, belts, and bearings. Lubrication of bearings and replacement of parts shall occur as necessary. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

8. Each calendar month, the permittee shall inspect the operational condition and integrity of all hooding, ductwork, and bypass dampers comprising the capture system. Hooding and ductwork observations shall include visual inspections for leaks or holes. Bypass damper observations shall include visual inspections to verify that the damper setting is in the correct position (i.e., to oxidizer or to atmosphere) and visual inspections of the actuator and motor to verify that the actuator pin and the motor are operating properly. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:

1.a A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

1.b All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

1.c These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31 and shall cover the records for the previous calendar quarters.

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

a. each time the interlock system stops the operation of this emissions unit because the thermal oxidizer is not in operation;

b. each average, total exhaust flow rate measurement that does not comply with the operational restriction specified in Section A.II.5, based on the records maintained pursuant to Section A.III.6 of these terms and conditions, and the magnitude of each deviation; and

c. each time any bypass dampers, actuator pins, and/or associated motors are not in the correct position and in good operating condition and/or any of the hooding or ductwork comprising the VOC emission capture system contains leaks or holes that would permit the escape of the captured VOC emissions.

3. The permittee shall submit annual reports that specify the results of each annual inspection of the electronics of the ventilation fan interlock systems and the thermal oxidizer interlock systems, based on the records maintained pursuant to Section A.III.5 of these terms and conditions.

IV. Reporting Requirements (continued)

4. The permittee will be subject to the proposed National Emission Standards for Hazardous Air Pollutants (NESHAP) for surface coating of Paper and Other Webs, 40 CFR, Part 63, Subpart JJJJ. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts: The deadline to submit the Part I application as specified in 40 CFR Part 63.53 was May 15, 2002.

5.a If the final MACT Standard is not promulgated by the deadline specified by U.S.EPA, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted within 60 days after the deadline to promulgate the respective standard, as specified by the settlement between U.S.EPA and Sierra Club. It must contain the information in paragraphs (i) through (vi) of this section.

i. For a new affected source, the anticipated date of startup of operation.

ii. The hazardous air pollutants emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for hazardous air pollutants from the affected source.

iii. Any existing federal, State, or local limitations or requirements applicable to the affected source.

iv. For each affected emission point or group of affected emission points, an identification of control technology in place.

v. Information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor.

vi. Any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to subpart A of 40 CFR Part 63.

5.b The Part II application for a MACT determination may, but is not required to, contain the following information:

i. Recommended emission limitations for the affected source and support information. The permittee may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation.

ii. A description of the control technologies that would be applied to meet the emission limitation including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied.

iii. Relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.

6. If the NESHAP is promulgated before May 15, 2004, the facility will be subject as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the Subpart, the permittee shall submit the following notifications:

IV. Reporting Requirements (continued)

6.a Within 120 days after promulgation of 40 CFR, Part 63, Subpart JJJJ, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standards. If the permittee is subject to the final standards, the following information shall also be included in the Initial Notification Report, in accordance with 40 CFR Part 63.9(b)(2):

i. the name and mailing address of the permittee;

ii. the physical location of the source if it is different from the mailing address;

iii. identification of the relevant MACT standards and the permittee's compliance date;

iv. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and

v. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.

6.b Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR, Part 63, Subpart JJJJ, the permittee shall submit a notification of compliance status that contains the following information:

i. the methods used to determine compliance;

ii. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

iv. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR, Part 63, Subpart JJJJ.

v. an analysis demonstrating whether the affected source is a major source or an area source;

vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and

vii. a statement of whether or not the permittee has complied with the requirements of 40 CFR, Part 63, Subpart JJJJ.

V. Testing Requirements

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

1.a The emission testing shall be conducted within 3 months after permit issuance and within 6 months prior to permit expiration.

1.b The emission testing shall be conducted to demonstrate compliance with OAC rule 3745-21-09(B)(6). Specifically, testing shall demonstrate an 81% overall reduction of organic compounds emitted by the emissions unit and a 90% destruction of the organic compounds that enter the thermal oxidizer.

V. Testing Requirements (continued)

1.c The following test method(s) shall be employed to demonstrate compliance with the organic compound reduction and destruction requirements:

Method 25 of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the inlet and outlet are greater than 50 ppm; or

Method 25A of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the inlet and outlet are less than 50 ppm; and

Methods 204 through Method 204F of 40 CFR Part 51, Appendix M.

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

1.d The tests shall be conducted while the emissions units K001, K002, K003, K004 and P003 are operating at or near their maximum capacities, unless otherwise specified or approved by the Northeast District Office of the Ohio EPA.

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

The control or destruction efficiency defined as the percent reduction of mass emissions between the inlet and outlet of the control system shall be determined in accordance with the test methods and prodedures specified in Ohio Administrative Code 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Treater # 4 (K004)

Activity Description: Epoxy and melomine coating of fiberglass fabric

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Treater #4 controlled by a thermal oxidizer	OAC rule 3745-21-09(B)(6)	See Section A.I.2.a.
	OAC rule 3745-31-05(A)(3) PTI No. 02-4870	See Section A.I.2.b.
	40 CFR 63 Subpart JJJJ	See Section A.I.2.c.

2. Additional Terms and Conditions

2.a In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraphs (F) and (G) of OAC rule 3745-21-09, the permittee shall comply with the provisions of OAC rule 3745-21-09(B)(6) for this emissions unit. The permittee shall operate and maintain an incineration system capable of capturing and controlling the VOC emissions from emissions units K001, K002, K003, K004, and P003.

The overall control efficiency for VOC for emissions units K001, K002, K003 and K004 shall not be less than 81%, by weight, and for emissions unit P003, not less than 85%, by weight. In addition, the thermal oxidizer shall provide a destruction efficiency of not less than 90%, by weight, for the VOC emissions vented to the control equipment.

2.b The controlled VOC emissions from this emissions unit shall not exceed 8.4 lbs VOC/hour, 203 lbs VOC/day and 37 tons VOC/year.

The requirements of this rule are also include compliance with the requirements of OAC rule 3745-21-09(B)(6).

2.c On September 13, 2000, U.S.EPA proposed the National Emission Standards for Hazardous Air Pollutants (NESHAP) for suface coating of Paper and Other Webs, at 40 CFR, Part 63, Subpart JJJJ. When the NESHAP is promulgated, the facility will be subject to the rules as an existing major source with a compliance date as specified in the NESHAP. See Sections A.IV.5, A.IV.6 and A.IV.7 for required reporting pertaining to these requirements.

II. Operational Restrictions

1. To comply with OAC rule 3745-21-09(B)(6), the thermal oxidizer shall be operated at all times when this emissions unit is in operation.

II. Operational Restrictions (continued)

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

3. All ventilation fans associated with this emissions unit and the thermal oxidizer shall be in operation at all times when this emissions unit is in operation.

4. When employing the thermal oxidizer, all bypass dampers, actuator pins, and associated motors shall be in the correct position and in good operating condition at all times when this emissions unit is in operation to ensure that all captured VOC emissions are vented to the thermal oxidizer. Also, all the hooding and ductwork comprising the VOC emission capture system for this emissions unit shall be free of leaks and holes that would permit the escape of the captured VOC emissions.

5. The average, total exhaust flow rate from this emissions unit to the thermal oxidizer shall not be less than the level determined during the last emission tests that demonstrated compliance with the overall control efficiency for VOC for emissions units K001, K002, K003, K004 and P003. The average, total exhaust flow rate will be determined by the same method used during the last emission test.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emission unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day for the control equipment:

2.a A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

2.b All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degress Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

3. The permittee shall collect and record the following information daily for all the coatings employed in this emissions unit that are vented to the thermal oxidizer and the cleanup materials associated with these coatings.

3.a The name and identification number of each coating, as applied.

3.b The VOC content of each coating, excluding water and exempt solvents, as applied, in pounds per gallon.

3.c The number of gallons of each coating employed, excluding water and exempt solvents.

3.d The name and identification of each cleanup material employed.

3.e The number of gallons of each cleanup material employed.

3.f The VOC content of each cleanup material, in pounds per gallon.

3.g The total uncontrolled VOC emissions from all coatings, in pounds, calculated as the summation of A.III.3.b multiplied by A.III.3.c, for each coating employed.

3.h The total uncontrolled VOC emissions from all cleanup materials, in pounds, calculated as the summation of A.III.3.e multiplied by A.III.3.f, for each cleanup material employed.

III. Monitoring and/or Record Keeping Requirements (continued)

3.i The calculated, controlled VOC emission rate for all coatings, in pounds (the controlled VOC emission rate for the coatings shall be calculated using the overall control efficiency for the control equipment as detemined during the most recent emission test that demonstrated that the emissions unit was in compliance).

3.j The total VOC emission rate, i.e., controlled VOC emissions from all coatings plus uncontrolled emissions from all cleanup materials, in pounds.

3.k The total number of hours this emissions unit was in operation.

3.l The average, hourly VOC emission rate for all coatings and cleanup materials, in pounds, calculated by dividing A.III.3.j by A.III.3.k.

4. The permittee shall perform an inspection of the thermal oxidizer on at least an annual basis. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations and shall include a physical inspection of the unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment shall be performed as determined by the inspection.

5. The permittee shall maintain a record of the results of each annual inspection of the thermal oxidizer.

6. On an annual basis, the permittee shall inspect the electronics of the thermal oxidizer interlock system used for this emissions unit to verify that the signals between the thermal oxidizer and the emissions unit are functioning properly. The permittee shall document the results of all annual inspections. An excursion is defined as a finding that an interlock is inoperative. Any excursion shall require that the process line be immediately shut down and remain shut down until the problem has been corrected.

7. Except as noted below, each calendar quarter, the permittee shall utilize an anemometer, or any other equivalent measurement method approved by the Ohio EPA, to measure the average, total exhaust flow rate from this emissions unit to the thermal oxidizer, in scfm. The anemometer, or other equivalent measurement method approved by the Ohio EPA, shall be capable of accurately measuring the desired parameter and shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The measurements shall be taken while this emissions unit and all other treaters at the facility are in a normal mode of operation. The permittee shall maintain records of the results of all exhaust flow rate measurements.

If the total exhaust flow rate measurements for four consecutive quarters do not identify a deviation of the applicable operational restriction, the permittee may perform the total exhaust flow rate measurements on a semiannual basis. Should the total exhaust flow rate measurements taken on a semiannual basis identify a deviation of the applicable operational restriction, the permittee shall revert to quarterly measurements.

8. Each calendar month, the permittee shall inspect the operational condition and integrity of the each ventilation fan comprising the capture system. Ventilation fan observations shall include visual inspections of the fan wheel, belts, and bearings. Lubrication of bearings and replacement of parts shall occur as necessary. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

9. Each calendar month, the permittee shall inspect the operational condition and integrity of all hooding, ductwork, and bypass dampers comprising the capture system. Hooding and ductwork observations shall include visual inspections for leaks or holes. Bypass damper observations shall include visual inspections to verify that the damper setting is in the correct position (i.e., to oxidizer or to atmosphere) and visual inspections of the actuator and motor to verify that the actuator pin and the motor are operating properly. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

1.a An identification of each day during which the total VOC emissions, as recorded in Section A.III.3.j, exceeded 203 pounds per day, and the actual VOC emissions for each such day.

IV. Reporting Requirements (continued)

1.b An identification of each day during which the average hourly VOC emissions, as recorded in Section A.III.3.l, exceeded 8.4 pounds per hour, and the actual average hourly VOC emissions for each such day.

2. The permittee shall submit quarterly summaries of the following records:

2.a A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

2.b All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

2.c Quarterly reports shall be submitted by April 30, July 31, October 31, and January 31 and shall cover the records for the previous calendar quarters.

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

a. each time the interlock system stops the operation of this emissions unit because the thermal oxidizer is not in operation;

b. each average, total exhaust flow rate measurement that does not comply with the operational restriction specified in Section A.II.5, based on the records maintained pursuant to Section A.III.7 of these terms and conditions, and the magnitude of each deviation; and

c. each time any bypass dampers, actuator pins, and/or associated motors are not in the correct position and in good operating condition and/or any of the hooding or ductwork comprising the VOC emission capture system contains leaks or holes that would permit the escape of the captured VOC emissions.

4. The permittee shall submit annual reports that specify the results of each annual inspection of the electronics of the ventilation fan interlock systems and the thermal oxidizer interlock systems, based on the records maintained pursuant to Section A.III.6 of these terms and conditions.

5. The permittee will be subject to the proposed National Emission Standards for Hazardous Air Pollutants (NESHAP) for surface coating of Paper and Other Webs, 40 CFR, Part 63, Subpart JJJJ. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts: The deadline to submit the Part I application as specified in 40 CFR Part 63.53 was May 15, 2002.

IV. Reporting Requirements (continued)

6.a If the final MACT Standard is not promulgated by the deadline specified by U.S.EPA, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted within 60 days after the deadline to promulgate the respective standard, as specified by the settlement between U.S.EPA and Sierra Club. It must contain the information in paragraphs (i) through (vi) of this section.

i. For a new affected source, the anticipated date of startup of operation.

ii. The hazardous air pollutants emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for hazardous air pollutants from the affected source.

iii. Any existing federal, State, or local limitations or requirements applicable to the affected source.

iv. For each affected emission point or group of affected emission points, an identification of control technology in place.

v. Information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor.

vi. Any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to subpart A of 40 CFR Part 63.

6.b The Part II application for a MACT determination may, but is not required to, contain the following information:

i. Recommended emission limitations for the affected source and support information. The permittee may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation.

ii. A description of the control technologies that would be applied to meet the emission limitation including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied.

iii. Relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.

7. If the NESHAP is promulgated before May 15, 2004, the facility will be subject as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the Subpart, the permittee shall submit the following notifications:

7.a Within 120 days after promulgation of 40 CFR, Part 63, Subpart JJJJ, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standards. If the permittee is subject to the final standards, the following information shall also be included in the Initial Notification Report, in accordance with 40 CFR Part 63.9(b)(2):

i. the name and mailing address of the permittee;

ii. the physical location of the source if it is different from the mailing address;

iii. identification of the relevant MACT standards and the permittee's compliance date;

iv. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and

v. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.

IV. Reporting Requirements (continued)

7.b Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR, Part 63, Subpart JJJJ, the permittee shall submit a notification of compliance status that contains the following information:

i. the methods used to determine compliance;

ii. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

iv. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR, Part 63, Subpart JJJJ.

v. an analysis demonstrating whether the affected source is a major source or an area source;

vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and

vii. a statement of whether or not the permittee has complied with the requirements of 40 CFR, Part 63, Subpart JJJJ.

V. Testing Requirements

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

1.a The emission testing shall be conducted within 3 months after permit issuance and within 6 months prior to permit expiration.

1.b The emission testing shall be conducted to demonstrate compliance with OAC rule 3745-21-09(B)(6). Specifically, testing shall demonstrate an 81% overall reduction of organic compounds emitted by the emissions unit and a 90% destruction of the organic compounds that enter the thermal oxidizer.

1.c The following test method(s) shall be employed to demonstrate compliance with the organic compound reduction and destruction requirements:

Method 25 of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the inlet and outlet are greater than 50 ppm; or

Method 25A of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the inlet and outlet are less than 50 ppm; and

Methods 204 through Method 204F of 40 CFR Part 51, Appendix M.

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

1.d The tests shall be conducted while the emissions units K001, K002, K003, K004 and P003 are operating at or near their maximum capacities, unless otherwise specified or approved by the Northeast District Office of the Ohio EPA.

V. Testing Requirements (continued)

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

The control or destruction efficiency defined as the percent reduction of mass emissions between the inlet and outlet of the control system shall be determined in accordance with the test methods and prodedures specified in Ohio Administrative Code 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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

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

2. Emission Limitation:
8.4 lbs VOC per hour

Applicable Compliance Method:
Compliance shall be based on the record keeping requirement in Section A.III.3.

If required, the permittee shall demonstrate compliance with this emissions limitation through emissions tests performed in accordance with 40 CFR, Part 60, Appendix A, Method 25 or 25A.

3. Emission Limitation:
203 lbs VOC per day

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements in Section A.III.3.

4. Emission Limitation:
37 tons per year

Applicable Compliance Method:
Compliance shall be based on the summation of daily emission rates, as recorded in Section A.III.3, for each day of the calendar year that this emissions unit is in operation.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Phenolic Resin Mixing (P003)

Activity Description: Phenolic resin and epoxy resin mixing for use at treaters

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Phenolic resin mixer having a maximum production rate of 2,320 lbs/hr, equipped with a thermal oxidizer	OAC rule 3745-21-07(G)(2)	Organic compounds (OC) emissions shall be reduced by at least 85%. See Section A.I.2.a.
	OAC rule 3745-21-07(G)(4)	OC emissions from photochemically reactive cleanup materials shall be included with the emissions regulated by OAC rule 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(6)(a)	The OC emissions reduction required by OAC rule 3745-21-07(G)(2) shall be performed by incineration, provided that at least 90% of the carbon in the organic material being incinerated is oxidized to carbon dioxide.
	40 CFR 63 Subpart WWWW	See Section A.I.2.c.

2. Additional Terms and Conditions

2.a Per OAC rule 3745-21-07(G)(2), the 85% OC emissions reduction is in lieu of complying with limits of 8 pounds OC per hour and 40 pounds OC per day.

2.b The thermal oxidizer serving this emissions unit also controls the volatile organic compound emissions from emissions units K001, K002, K003 and K004.

2.c On August 2, 2001, U.S.EPA proposed the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, at 40 CFR, Part 63, Subpart WWWW. When the NESHAP is promulgated, the facility will be subject to the rules as an existing major source with a compliance date as specified in the NESHAP. See Sections A.IV.4, A.IV.5 and A.IV.6 for required reporting pertaining to these requirements.

2.d There shall be no uncontrolled particulate emissions from this emissions unit.

II. Operational Restrictions

1. To comply with OAC rule 3745-21-07(G)(2), the thermal oxidizer shall be operated at all times when this emissions unit is in operation.

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

3. All ventilation fans associated with this emissions unit and the thermal oxidizer shall be in operation at all times when this emissions unit is in operation.

4. When employing the thermal oxidizer, all bypass dampers, actuator pins, and associated motors shall be in the correct position and in good operating condition at all times when this emissions unit is in operation to ensure that all captured VOC emissions are vented to the thermal oxidizer. Also, all the hooding and ductwork comprising the VOC emission capture system for this emissions unit shall be free of leaks and holes that would permit the escape of the captured VOC emissions.

5. The average, total exhaust flow rate from this emissions unit to the thermal oxidizer shall not be less than the level determined during the last emission tests that demonstrated compliance with the overall control efficiency for VOC for emissions units K001, K002, K003, K004 and P003. The average, total exhaust flow rate will be determined by the same method used during the last emission test.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day for the control equipment:

2.a A log of the downtime for the capture (collection) system, control device, and montoring equipment, when the associated emissions unit was in operation.

2.b All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance.

3. The permittee shall perform an inspection of the thermal oxidizer on at least an annual basis. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations and shall include a physical inspection of the unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment shall be performed as determined by the inspection.

4. The permittee shall maintain a record of the results of each annual inspection of the thermal oxidizer.

5. On an annual basis, the permittee shall inspect the electronics of the thermal oxidizer interlock system used for this emissions unit to verify that the signals between the thermal oxidizer and the emissions unit are functioning properly. The permittee shall document the results of all annual inspections. An excursion is defined as a finding that an interlock is inoperative. Any excursion shall require that the process line be immediately shut down and remain shut down until the problem has been corrected.

III. Monitoring and/or Record Keeping Requirements (continued)

6. Except as noted below, each calendar quarter, the permittee shall utilize an anemometer, or any other equivalent measurement method approved by the Ohio EPA, to measure the average, total exhaust flow rate from this emissions unit to the thermal oxidizer, in scfm. The anemometer, or other equivalent measurement method approved by the Ohio EPA, shall be capable of accurately measuring the desired parameter and shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The measurements shall be taken while this emissions unit and the treaters at the facility are in a normal mode of operation. The permittee shall maintain records of the results of all exhaust flow rate measurements.

If the total exhaust flow rate measurements for four consecutive quarters do not identify a deviation of the applicable operational restriction, the permittee may perform the total exhaust flow rate measurements on a semiannual basis. Should the total exhaust flow rate measurements taken on a semiannual basis identify a deviation of the applicable operational restriction, the permittee shall revert to quarterly measurements.

7. Each calendar month, the permittee shall inspect the operational condition and integrity of the each ventilation fan comprising the capture system. Ventilation fan observations shall include visual inspections of the fan wheel, belts, and bearings. Lubrication of bearings and replacement of parts shall occur as necessary. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

8. Each calendar month, the permittee shall inspect the operational condition and integrity of all hooding, ductwork, and bypass dampers comprising the capture system. Hooding and ductwork observations shall include visual inspections for leaks or holes. Bypass damper observations shall include visual inspections to verify that the damper setting is in the correct position (i.e., to oxidizer or to atmosphere) and visual inspections of the actuator and motor to verify that the actuator pin and the motor are operating properly. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:

1.a A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

1.b All 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.

1.c These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31 and shall cover the records for the previous calendar quarters.

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

a. each time the interlock system stops the operation of this emissions unit because the thermal oxidizer is not in operation;

b. each average, total exhaust flow rate measurement that does not comply with the operational restriction specified in Section A.II.5, based on the records maintained pursuant to Section A.III.6 of these terms and conditions, and the magnitude of each deviation; and

c. each time any bypass dampers, actuator pins, and/or associated motors are not in the correct position and in good operating condition and/or any of the hooding or ductwork comprising the VOC emission capture system contains leaks or holes that would permit the escape of the captured VOC emissions.

3. The permittee shall submit annual reports that specify the results of each annual inspection of the electronics of the ventilation fan interlock systems and the thermal oxidizer interlock systems, based on the records maintained pursuant to Section A.III.5 of these terms and conditions.

IV. Reporting Requirements (continued)

4. The permittee will be subject to the proposed National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, 40 CFR, Part 63, Subpart WWWW. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts: The deadline to submit the Part I application as specified in 40 CFR Part 63.53 was May 15, 2002.

5.a If the final MACT Standard is not promulgated by the deadline specified by U.S.EPA, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted within 60 days after the deadline to promulgate the respective standard, as specified by the settlement between U.S.EPA and Sierra Club. It must contain the information in paragraphs (i) through (vi) of this section.

i. For a new affected source, the anticipated date of startup of operation.

ii. The hazardous air pollutants emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for hazardous air pollutants from the affected source.

iii. Any existing federal, State, or local limitations or requirements applicable to the affected source.

iv. For each affected emission point or group of affected emission points, an identification of control technology in place.

v. Information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor.

vi. Any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to subpart A of 40 CFR Part 63.

5.b The Part II application for a MACT determination may, but is not required to, contain the following information:

i. Recommended emission limitations for the affected source and support information. The permittee may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation.

ii. A description of the control technologies that would be applied to meet the emission limitation including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied.

iii. Relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.

6. If the NESHAP is promulgated before May 15, 2004, the facility will be subject as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the Subpart, the permittee shall submit the following notifications:

IV. Reporting Requirements (continued)

6.a Within 120 days after promulgation of 40 CFR, Part 63, Subpart WWWW, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standards. If the permittee is subject to the final standards, the following information shall also be included in the Initial Notification Report, in accordance with 40 CFR Part 63.9(b)(2):

i. the name and mailing address of the permittee;

ii. the physical location of the source if it is different from the mailing address;

iii. identification of the relevant MACT standards and the permittee's compliance date;

iv. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and

v. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.

6.b Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR, Part 63, Subpart WWWW, the permittee shall submit a notification of compliance status that contains the following information:

i. the methods used to determine compliance;

ii. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

iv. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR, Part 63, Subpart WWWW.

v. an analysis demonstrating whether the affected source is a major source or an area source;

vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and

vii. a statement of whether or not the permittee has complied with the requirements of 40 CFR, Part 63, Subpart WWWW.

V. Testing Requirements

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

1.a The emission testing shall be conducted within 3 months after permit issuance and within 6 months prior to permit expiration.

1.b. The emission testing shall be conducted to demonstrate compliance with OAC rules 3745-21-07(G)(2) and 3745-21-07(G)(6)(a). Specifically, testing shall demonstrate an 85% reduction in the organic compounds emitted by the emissions unit and a 90% destruction of the organic compounds that enter the thermal oxidizer.

V. Testing Requirements (continued)

1.c. The following test method(s) shall be employed to demonstrate compliance with the organic compound reduction and destruction requirements:

Method 25 of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the inlet and outlet are greater than 50 ppm; or

Method 25A of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the inlet and outlet are less than 50 ppm; and

Methods 204 through Method 204F of 40 CFR Part 51, Appendix M.

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

1.d. The tests shall be conducted while emissions units K001, K002, K003, K004 and P003 are operating at or near their maximum capacities, unless otherwise specified or approved by the Northeast District Office of the Ohio EPA.

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

The control or destruction efficiency defined as the percent reduction of mass emissions between the inlet and outlet of the control system shall be determined in accordance with the test methods and prodedures specified in Ohio Administrative Code 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Politen mixer (P006)

Activity Description: Politen mixing from polyester resin and fillers for compression molding

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Politen mixer having a maximum production rate of 1,000 lbs/hr, equipped with a 99.9% efficient fabric filter for dust control.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average.
	OAC rule 3745-17-11	Particulate emissions (PE) shall not exceed 1.78 lbs/hr.
	OAC rule 3745-21-07(G)(2)	Organic compounds (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day, excluding emissions from non-photochemically reactive cleanup materials. See Section A.I.2.a.
	OAC rule 3745-21-07(G)(4)	OC emissions from photochemically reactive cleanup materials shall be included with the emissions regulated by OAC rule 3745-21-07(G)(2).
	OAC rule 3745-31-05(A)(3) PTI NO. 02-869	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11, 3745-21-07(G)(2) and 3745-21-07(G)(4).
	40 CFR 63 Subpart WWWW	See section A.I.2.b.

2. Additional Terms and Conditions

2.a OC emissions from this emissions unit consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

2.b On August 2, 2001, U.S.EPA proposed the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, at 40 CFR, Part 63, Subpart WWWW. When the NESHAP is promulgated, the facility will be subject to the rules as an existing major source with a compliance date as specified in the NESHAP. See Sections A.IV.3, A.IV.4 and A.IV.5 for required reporting pertaining to these requirements.

2. Additional Terms and Conditions (continued)

2.c All particulate emissions from this emissions unit shall be vented to the 99.9% efficient fabric filter that is placed at the intake of the exhaust for this emissions unit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

1.a The company identification for each mix produced and each photochemically reactive cleanup material employed.

1.b The weight of politen mix produced, in pounds.

1.c The styrene content of each mix produced, in percent by weight.

1.d The total organic compound (OC) emissions rate from all the mixes, in pounds, calculated by the following equation:

E(OC) = summation of (Wi x OCi/100) x EF(OC)

where:

E(OC) = OC emissions, as styrene, from the mix operations, in pounds per day.

Wi = the weight of mix i produced, in pounds per day.

OCi = the styrene content of mix i, in percent by weight.

EF(OC) = emission factor from AP-42 Chapter 6.4, (1/95), that is, 0.01 pound per pound of available OC content.

1.e The actual number of hours that the emissions unit was in operation.

1.f The volume, in gallons, of each photochemically reactive cleanup material employed.

1.g The OC content of each photochemically reactive cleanup material employed, in pounds per gallon.

1.h The total OC emissions from all the photochemically reactive cleanup materials, calculated by the following equation:

E = the summation of the product of A times B for each of the photochemically reactive cleanup materials employed.

where:

E = the total OC emissions from all the photochemically reactive cleanup materials employed.

A = volume of each photochemically reactive cleanup material employed, as recorded in Section A.III.1.f.

B = OC content of each photochemically reactive cleanup material employed, as recorded in Section A.III.1.g.

1.i The total OC emissions rate for all mixes and all photochemically reactive cleanup materials, in pounds per day, i.e., the sum of A.III.1.d and A.III.1.h.

III. Monitoring and/or Record Keeping Requirements (continued)

1.j The average, hourly OC emissions rate for all mixes and all photochemically reactive cleanup materials, in pounds per hour, i.e., A.III.1.i divided by A.III.1.e.

1.k An identification of any time periods when the 99.9% efficient fabric filter placed at the intake of the exhaust for this emissions unit was not in place and/or was not functional.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

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

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

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

1.a An identification of each day during which the average hourly OC emissions exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.

1.b An identification of each day during which the OC emissions exceeded 40 pounds per day, and the actual OC emissions for each such day.

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. The permittee will be subject to the proposed National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, 40 CFR, Part 63, Subpart WWWW. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts: The deadline to submit the Part I application as specified in 40 CFR Part 63.53 was May 15, 2002.

IV. Reporting Requirements (continued)

4.a If the final MACT Standard is not promulgated by the deadline specified by U.S.EPA, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted within 60 days after the deadline to promulgate the respective standard, as specified by the settlement between U.S.EPA and Sierra Club. It must contain the information in paragraphs (i) through (vi) of this section.

i. For a new affected source, the anticipated date of startup of operation.

ii. The hazardous air pollutants emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for hazardous air pollutants from the affected source.

iii. Any existing federal, State, or local limitations or requirements applicable to the affected source.

iv. For each affected emission point or group of affected emission points, an identification of control technology in place.

v. Information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor.

vi. Any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to subpart A of 40 CFR Part 63.

4.b The Part II application for a MACT determination may, but is not required to, contain the following information:

i. Recommended emission limitations for the affected source and support information. The permittee may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation.

ii. A description of the control technologies that would be applied to meet the emission limitation including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied.

iii. Relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.

5. If the NESHAP is promulgated before May 15, 2004, the facility will be subject as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the Subpart, the permittee shall submit the following notifications:

5.a Within 120 days after promulgation of 40 CFR, Part 63, Subpart WWWW, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standards. If the permittee is subject to the final standards, the following information shall also be included in the Initial Notification Report, in accordance with 40 CFR Part 63.9(b)(2):

i. the name and mailing address of the permittee;

ii. the physical location of the source if it is different from the mailing address;

iii. identification of the relevant MACT standards and the permittee's compliance date;

iv. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and

v. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.

IV. Reporting Requirements (continued)

5.b Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR, Part 63, Subpart WWWW, the permittee shall submit a notification of compliance status that contains the following information:

i. the methods used to determine compliance;

ii. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

iv. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR, Part 63, Subpart WWWW.

v. an analysis demonstrating whether the affected source is a major source or an area source;

vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and

vii. a statement of whether or not the permittee has complied with the requirements of 40 CFR, Part 63, Subpart WWWW.

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:
20% opacity of visible PE, as a 6-minute average.

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

1.b Emission Limitation:
1.78 lbs PE per hour

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR 60, Appendix A, Methods 1-5.

1.c Emission Limitation:
8 lbs OC per hour

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements in Section A.III.1.

1.d Emission Limitation:
40 lbs OC per day

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements in Section A.III.1.

V. Testing Requirements (continued)

1.e USEPA Method 24 shall be used to determine VOC content for all coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or an operator determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Compression Press A (P013)

Activity Description: Compression molding flat sheet from polyester resin and fiberglass and fillers

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Compression Mold Press "A"	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A)(3) PTI No. 02-0406 (synthetic minor)	Emissions of organic compounds (OC), including hazardous air pollutants (HAPs), shall not exceed 3.81 lbs/day and 0.70 ton/year. See Sections A.I.2.a and A.I.2.b.
	40 CFR 63 Subpart WWWW	See Section A.I.2.c.

2. Additional Terms and Conditions

2.a The maximum styrene content in each mold material shall not exceed 14.3% by weight.

2.b The OC emissions from this emissions unit shall not exceed 0.70 ton per year, based upon a rolling, 12-month summation.

2.c On August 2, 2001, U.S.EPA proposed the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, at 40 CFR, Part 63, Subpart WWWW. When the NESHAP is promulgated, the facility will be subject to the rules as an existing major source with a compliance date as specified in the NESHAP. See Sections A.IV.2, A.IV.3 and A.IV.4 for required reporting pertaining to these requirements.

II. Operational Restrictions

1. The maximum daily raw material usage for this emissions unit shall not exceed 2,644 pounds of mold materials per day.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of the following information for this emissions unit:

1.a The company identification for each mold material employed.

III. Monitoring and/or Record Keeping Requirements (continued)

1.b The weight of each mold material employed, in pounds.

1.c The total weight of all the mold materials employed, in pounds.

1.d The styrene content of each mold material, in percent by weight.

1.e The total organic compound emission rate for all mold materials, in pounds per day, calculated as specified in Section A.V.1.a.

1.f The total number of hours the emissions unit was in operation.

1.g The average, hourly, OC emission rate for all mold materials (calculated by dividing the total, daily OC emissions by the total hours of operation), in pounds per hour.

2. The permittee shall maintain monthly records of the monthly and rolling, 12-month OC emissions from this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information.

1.a An identification of each day during which the OC emissions exceeded 3.81 pounds per day, and the actual OC emissions for each such day.

1.b An identification of each mold material with a styrene content that exceeded 14.3% by weight, and the actual styrene content for each such mold material.

1.c An identification of each day during which the daily raw material usage exceeded 2,644 pounds of mold materials, and the actual raw material usage for each such day.

1.d An identification of each month during which the rolling, 12-month OC emissions exceeded 0.70 ton, and the actual OC emissions for each such 12-month period.

2. The permittee will be subject to the proposed National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, 40 CFR, Part 63, Subpart WWWW. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts: The deadline to submit the Part I application as specified in 40 CFR Part 63.53 was May 15, 2002.

IV. Reporting Requirements (continued)

3.a If the final MACT Standard is not promulgated by the deadline specified by U.S.EPA, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted within 60 days after the deadline to promulgate the respective standard, as specified by the settlement between U.S.EPA and Sierra Club. It must contain the information in paragraphs (i) through (vi) of this section.

i. For a new affected source, the anticipated date of startup of operation.

ii. The hazardous air pollutants emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for hazardous air pollutants from the affected source.

iii. Any existing federal, State, or local limitations or requirements applicable to the affected source.

iv. For each affected emission point or group of affected emission points, an identification of control technology in place.

v. Information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor.

vi. Any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to subpart A of 40 CFR Part 63.

3.b The Part II application for a MACT determination may, but is not required to, contain the following information:

i. Recommended emission limitations for the affected source and support information. The permittee may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation.

ii. A description of the control technologies that would be applied to meet the emission limitation including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied.

iii. Relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.

4. If the NESHAP is promulgated before May 15, 2004, the facility will be subject as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the Subpart, the permittee shall submit the following notifications:

4.a Within 120 days after promulgation of 40 CFR, Part 63, Subpart WWWW, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standards. If the permittee is subject to the final standards, the following information shall also be included in the Initial Notification Report, in accordance with 40 CFR Part 63.9(b)(2):

i. the name and mailing address of the permittee;

ii. the physical location of the source if it is different from the mailing address;

iii. identification of the relevant MACT standards and the permittee's compliance date;

iv. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and

v. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.

IV. Reporting Requirements (continued)

4.b Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR, Part 63, Subpart WWWW, the permittee shall submit a notification of compliance status that contains the following information:

i. the methods used to determine compliance;

ii. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

iv. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR, Part 63, Subpart WWWW.

v. an analysis demonstrating whether the affected source is a major source or an area source;

vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and

vii. a statement of whether or not the permittee has complied with the requirements of 40 CFR, Part 63, Subpart WWWW.

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a. Emission Limitation:
3.81 lbs OC per day

Applicable Compliance Method:
Compliance shall be based on the following equation:

E(OC) = the summation of (Pol) x (S/100) x (EF/100) for each of the mold materials employed.

where:

E(OC) = total OC emissions, in pounds per day.

(Pol) = the weight of each mold material employed, in pounds per day, as recorded in Section A.III.1.b.

(S) = the organic compound (styrene) content of each mold material, in percent by weight, as recorded in Section A.III.1.c.

(EF) = the emission factor of 1%. This EF is within the 1-3% range provided in Table 4.12-2 on page 4.12-8 of AP-42 (9/88).

1.b. Emission Limitation:
0.70 ton OC per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements in Section A.III.1 and 2.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Compression Press B (P014)

Activity Description: Compression molding flat sheet from polyester resin and fiberglass and fillers

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Compression Mold Press "B"	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A)(3) PTI No. 02-0406 (synthetic minor)	Emissions of organic compounds (OC), including hazardous air pollutants (HAPs), shall not exceed 3.81 lbs/day and 0.70 ton/year. See Sections A.I.2.a and A.I.2.b.
	40 CFR 63 Subpart WWWW	See Section A.I.2.c.

2. Additional Terms and Conditions

2.a. The maximum styrene content in each mold material shall not exceed 14.3% by weight.

2.b. The OC emissions from this emissions unit shall not exceed 0.70 ton per year, based upon a rolling, 12-month summation.

2.c. On August 2, 2001, U.S.EPA proposed the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, at 40 CFR, Part 63, Subpart WWWW. When the NESHAP is promulgated, the facility will be subject to the rules as an existing major source with a compliance date as specified in the NESHAP. See Sections A.IV.2, A.IV.3 and A.IV.4 for required reporting pertaining to these requirements.

II. Operational Restrictions

1. The maximum daily raw material usage for this emissions unit shall not exceed 2,644 pounds of mold materials per day.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of the following information for this emissions unit:

1.a The company identification for each mold material employed.

III. Monitoring and/or Record Keeping Requirements (continued)

1.b The weight of each mold material employed, in pounds.

1.c The total weight of all the mold materials employed, in pounds.

1.d The styrene content of each mold material, in percent by weight.

1.e The total organic compound emission rate for all mold materials, in pounds per day, calculated as specified in Section A.V.1.a.

1.f The total number of hours the emissions unit was in operation.

1.g The average, hourly, OC emission rate for all mold materials (calculated by dividing the total, daily OC emissions by the total hours of operation), in pounds per hour.

2. The permittee shall maintain monthly records of the monthly and rolling, 12-month OC emissions from this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information.

1.a An identification of each day during which the OC emissions exceeded 3.81 pounds per day, and the actual OC emissions for each such day.

1.b An identification of each mold material with a styrene content that exceeded 14.3% by weight, and the actual styrene content for each such mold material.

1.c An identification of each day during which the daily raw material usage exceeded 2,644 pounds of mold materials, and the actual raw material usage for each such day.

1.d An identification of each month during which the rolling, 12-month OC emissions exceeded 0.70 ton, and the actual OC emissions for each such 12-month period.

2. The permittee will be subject to the proposed National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, 40 CFR, Part 63, Subpart WWWW. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts: The deadline to submit the Part I application as specified in 40 CFR Part 63.53 was May 15, 2002.

IV. Reporting Requirements (continued)

3.a If the final MACT Standard is not promulgated by the deadline specified by U.S.EPA, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted within 60 days after the deadline to promulgate the respective standard, as specified by the settlement between U.S.EPA and Sierra Club. It must contain the information in paragraphs (i) through (vi) of this section.

i. For a new affected source, the anticipated date of startup of operation.

ii. The hazardous air pollutants emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for hazardous air pollutants from the affected source.

iii. Any existing federal, State, or local limitations or requirements applicable to the affected source.

iv. For each affected emission point or group of affected emission points, an identification of control technology in place.

v. Information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor.

vi. Any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to subpart A of 40 CFR Part 63.

3.b The Part II application for a MACT determination may, but is not required to, contain the following information:

i. Recommended emission limitations for the affected source and support information. The permittee may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation.

ii. A description of the control technologies that would be applied to meet the emission limitation including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied.

iii. Relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.

4. If the NESHAP is promulgated before May 15, 2004, the facility will be subject as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the Subpart, the permittee shall submit the following notifications:

4.a Within 120 days after promulgation of 40 CFR, Part 63, Subpart WWWW, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standards. If the permittee is subject to the final standards, the following information shall also be included in the Initial Notification Report, in accordance with 40 CFR Part 63.9(b)(2):

i. the name and mailing address of the permittee;

ii. the physical location of the source if it is different from the mailing address;

iii. identification of the relevant MACT standards and the permittee's compliance date;

iv. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and

v. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.

IV. Reporting Requirements (continued)

4.b Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR, Part 63, Subpart WWWW, the permittee shall submit a notification of compliance status that contains the following information:

i. the methods used to determine compliance;

ii. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

iv. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR, Part 63, Subpart WWWW.

v. an analysis demonstrating whether the affected source is a major source or an area source;

vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and

vii. a statement of whether or not the permittee has complied with the requirements of 40 CFR, Part 63, Subpart WWWW.

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a. Emission Limitation:
3.81 lbs OC per day

Applicable Compliance Method:
Compliance shall be based on the following equation:

E(OC) = the summation of (Pol) x (S/100) x (EF/100) for each of the mold materials employed.

where:

E(OC) = total OC emissions, in pounds per day.

(Pol) = the weight of each mold material employed, in pounds per day, as recorded in Section A.III.1.b.

(S) = the organic compound (styrene) content of each mold material, in percent by weight, as recorded in Section A.III.1.c.

(EF) = the emission factor of 1%. This EF is within the 1-3% range provided in Table 4.12-2 on page 4.12-8 of AP-42 (9/88).

1.b. Emission Limitation:
0.70 ton OC per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements in Section A.III.1 and 2.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Compression Press C (P015)

Activity Description: Compression molding flat sheet from polyester resin and fiberglass and fillers

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Compression Mold Press "C"	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A)(3) PTI No. 02-0406 (synthetic minor)	Emissions of organic compounds (OC), including hazardous air pollutants (HAPs), shall not exceed 3.81 lbs/day and 0.70 ton/year. See Sections A.I.2.a and A.I.2.b.
	40 CFR 63 Subpart WWWW	See Section A.I.2.c.

2. Additional Terms and Conditions

2.a. The maximum styrene content in each mold material shall not exceed 14.3% by weight.

2.b. The OC emissions from this emissions unit shall not exceed 0.70 ton per year, based upon a rolling, 12-month summation.

2.c. On August 2, 2001, U.S.EPA proposed the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, at 40 CFR, Part 63, Subpart WWWW. When the NESHAP is promulgated, the facility will be subject to the rules as an existing major source with a compliance date as specified in the NESHAP. See Sections A.IV.2, A.IV.3 and A.IV.4 for required reporting pertaining to these requirements.

II. Operational Restrictions

1. The maximum daily raw material usage for this emissions unit shall not exceed 2,644 pounds of mold materials per day.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of the following information for this emissions unit:

1.a The company identification for each mold material employed.

III. Monitoring and/or Record Keeping Requirements (continued)

1.b The weight of each mold material employed, in pounds.

1.c The total weight of all the mold materials employed, in pounds.

1.d The styrene content of each mold material, in percent by weight.

1.e The total organic compound emission rate for all mold materials, in pounds per day, calculated as specified in Section A.V.1.a.

1.f The total number of hours the emissions unit was in operation.

1.g The average, hourly, OC emission rate for all mold materials (calculated by dividing the total, daily OC emissions by the total hours of operation), in pounds per hour.

2. The permittee shall maintain monthly records of the monthly and rolling, 12-month OC emissions from this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information.

1.a An identification of each day during which the OC emissions exceeded 3.81 pounds per day, and the actual OC emissions for each such day.

1.b An identification of each mold material with a styrene content that exceeded 14.3% by weight, and the actual styrene content for each such mold material.

1.c An identification of each day during which the daily raw material usage exceeded 2,644 pounds of mold materials, and the actual raw material usage for each such day.

1.d An identification of each month during which the rolling, 12-month OC emissions exceeded 0.70 ton, and the actual OC emissions for each such 12-month period.

2. The permittee will be subject to the proposed National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, 40 CFR, Part 63, Subpart WWWW. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts: The deadline to submit the Part I application as specified in 40 CFR Part 63.53 was May 15, 2002.

IV. Reporting Requirements (continued)

3.a If the final MACT Standard is not promulgated by the deadline specified by U.S.EPA, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted within 60 days after the deadline to promulgate the respective standard, as specified by the settlement between U.S.EPA and Sierra Club. It must contain the information in paragraphs (i) through (vi) of this section.

i. For a new affected source, the anticipated date of startup of operation.

ii. The hazardous air pollutants emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for hazardous air pollutants from the affected source.

iii. Any existing federal, State, or local limitations or requirements applicable to the affected source.

iv. For each affected emission point or group of affected emission points, an identification of control technology in place.

v. Information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor.

vi. Any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to subpart A of 40 CFR Part 63.

3.b The Part II application for a MACT determination may, but is not required to, contain the following information:

i. Recommended emission limitations for the affected source and support information. The permittee may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation.

ii. A description of the control technologies that would be applied to meet the emission limitation including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied.

iii. Relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.

4. If the NESHAP is promulgated before May 15, 2004, the facility will be subject as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the Subpart, the permittee shall submit the following notifications:

4.a Within 120 days after promulgation of 40 CFR, Part 63, Subpart WWWW, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standards. If the permittee is subject to the final standards, the following information shall also be included in the Initial Notification Report, in accordance with 40 CFR Part 63.9(b)(2):

i. the name and mailing address of the permittee;

ii. the physical location of the source if it is different from the mailing address;

iii. identification of the relevant MACT standards and the permittee's compliance date;

iv. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and

v. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.

IV. Reporting Requirements (continued)

4.b Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR, Part 63, Subpart WWWW, the permittee shall submit a notification of compliance status that contains the following information:

i. the methods used to determine compliance;

ii. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

iv. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR, Part 63, Subpart WWWW.

v. an analysis demonstrating whether the affected source is a major source or an area source;

vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and

vii. a statement of whether or not the permittee has complied with the requirements of 40 CFR, Part 63, Subpart WWWW.

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a. Emission Limitation:
3.81 lbs OC per day

Applicable Compliance Method:
Compliance shall be based on the following equation:

E(OC) = the summation of (Pol) x (S/100) x (EF/100) for each of the mold materials employed.

where:

E(OC) = total OC emissions, in pounds per day.

(Pol) = the weight of each mold material employed, in pounds per day, as recorded in Section A.III.1.b.

(S) = the organic compound (styrene) content of each mold material, in percent by weight, as recorded in Section A.III.1.c.

(EF) = the emission factor of 1%. This EF is within the 1-3% range provided in Table 4.12-2 on page 4.12-8 of AP-42 (9/88).

1.b. Emission Limitation:
0.70 ton OC per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements in Section A.III.1 and 2.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Compression Press D (P016)

Activity Description: Compression molding flat sheet from polyester resin and fiberglass and fillers

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Compression Mold Press "D"	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A)(3) PTI No. 02-0406 (synthetic minor)	Emissions of organic compounds (OC), including hazardous air pollutants (HAPs), shall not exceed 3.81 lbs/day and 0.70 ton/year. See Sections A.I.2.a and A.I.2.b.
	40 CFR 63 Subpart WWWW	See Section A.I.2.c.

2. Additional Terms and Conditions

2.a. The maximum styrene content in each mold material shall not exceed 14.3% by weight.

2.b. The OC emissions from this emissions unit shall not exceed 0.70 ton per year, based upon a rolling, 12-month summation.

2.c. On August 2, 2001, U.S.EPA proposed the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, at 40 CFR, Part 63, Subpart WWWW. When the NESHAP is promulgated, the facility will be subject to the rules as an existing major source with a compliance date as specified in the NESHAP. See Sections A.IV.2, A.IV.3 and A.IV.4 for required reporting pertaining to these requirements.

II. Operational Restrictions

1. The maximum daily raw material usage for this emissions unit shall not exceed 2,644 pounds of mold materials per day.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of the following information for this emissions unit:

1.a The company identification for each mold material employed.

III. Monitoring and/or Record Keeping Requirements (continued)

1.b The weight of each mold material employed, in pounds.

1.c The total weight of all the mold materials employed, in pounds.

1.d The styrene content of each mold material, in percent by weight.

1.e The total organic compound emission rate for all mold materials, in pounds per day, calculated as specified in Section A.V.1.a.

1.f The total number of hours the emissions unit was in operation.

1.g The average, hourly, OC emission rate for all mold materials (calculated by dividing the total, daily OC emissions by the total hours of operation), in pounds per hour.

2. The permittee shall maintain monthly records of the monthly and rolling, 12-month OC emissions from this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

1.a An identification of each day during which the OC emissions exceeded 3.81 pounds per day, and the actual OC emissions for each such day.

1.b An identification of each mold material with a styrene content that exceeded 14.3% by weight, and the actual styrene content for each such mold material.

1.c An identification of each day during which the daily raw material usage exceeded 2,644 pounds of mold materials, and the actual raw material usage for each such day.

1.d An identification of each month during which the rolling, 12-month OC emissions exceeded 0.70 ton, and the actual OC emissions for each such 12-month period.

2. The permittee will be subject to the proposed National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, 40 CFR, Part 63, Subpart WWWW. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts: The deadline to submit the Part I application as specified in 40 CFR Part 63.53 was May 15, 2002.

IV. Reporting Requirements (continued)

3.a If the final MACT Standard is not promulgated by the deadline specified by U.S.EPA, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted within 60 days after the deadline to promulgate the respective standard, as specified by the settlement between U.S.EPA and Sierra Club. It must contain the information in paragraphs (i) through (vi) of this section.

i. For a new affected source, the anticipated date of startup of operation.

ii. The hazardous air pollutants emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for hazardous air pollutants from the affected source.

iii. Any existing federal, State, or local limitations or requirements applicable to the affected source.

iv. For each affected emission point or group of affected emission points, an identification of control technology in place.

v. Information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor.

vi. Any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to subpart A of 40 CFR Part 63.

3.b The Part II application for a MACT determination may, but is not required to, contain the following information:

i. Recommended emission limitations for the affected source and support information. The permittee may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation.

ii. A description of the control technologies that would be applied to meet the emission limitation including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied.

iii. Relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.

4. If the NESHAP is promulgated before May 15, 2004, the facility will be subject as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the Subpart, the permittee shall submit the following notifications:

4.a Within 120 days after promulgation of 40 CFR, Part 63, Subpart WWWW, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standards. If the permittee is subject to the final standards, the following information shall also be included in the Initial Notification Report, in accordance with 40 CFR Part 63.9(b)(2):

i. the name and mailing address of the permittee;

ii. the physical location of the source if it is different from the mailing address;

iii. identification of the relevant MACT standards and the permittee's compliance date;

iv. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and

v. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.

IV. Reporting Requirements (continued)

4.b Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR, Part 63, Subpart WWWW, the permittee shall submit a notification of compliance status that contains the following information:

i. the methods used to determine compliance;

ii. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

iv. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR, Part 63, Subpart WWWW.

v. an analysis demonstrating whether the affected source is a major source or an area source;

vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and

vii. a statement of whether or not the permittee has complied with the requirements of 40 CFR, Part 63, Subpart WWWW.

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:
3.81 lbs OC per day

Applicable Compliance Method:
Compliance shall be based on the following equation:

E(OC) = the summation of (Pol) x (S/100) x (EF/100) for each of the mold materials employed.

where:

E(OC) = total OC emissions, in pounds per day.

(Pol) = the weight of each mold material employed, in pounds per day, as recorded in Section A.III.1.b.

(S) = the organic compound (styrene) content of each mold material, in percent by weight, as recorded in Section A.III.1.c.

(EF) = the emission factor of 1%. This EF is within the 1-3% range provided in Table 4.12-2 on page 4.12-8 of AP-42 (9/88).

1.b Emission Limitation:
0.70 ton OC per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements in Section A.III.1 and 2.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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