



10/01/2026

Mr. Tony Giancola
Zehrco Plastics Inc. (Plant 2)
1501 West 47th Street
Ashtabula, OH 44004

Facility ID: 0204010265
Permit Number: P0140358
County: Ashtabula

RE: DRAFT AIR POLLUTION TITLE V PERMIT

Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and Public Notices website, [Weekly Review and Public Notices](#). A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Ohio EPA document search website here: [eDocument Search](#). Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and

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

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published on the Ohio EPA Weekly Review and Public Notices website, [Weekly Review and Public Notices | Ohio Environmental Protection Agency](#). You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)963-1200.

Sincerely,

Robert Hodanbosi
Chief, Division of Air Pollution Control

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

Public Notice

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: [Weekly Review and Public Notices | Ohio Environmental Protection Agency](#) or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Phone: 614-644-3037 Email: HClerk@epa.ohio.gov

Draft Title V Permit Renewal

Zehrco Plastics Inc. (Plant 2)

1501 West 47 th Street

Ashtabula, OH 44004-0000

ID#: P0140358

Date of Action: 10/01/2026

Permit Desc: Title V renewal for a plastic parts manufacturing facility.

The permit can be accessed electronically and comments may be submitted at: <https://ohioepa.commentinput.com> - Search by entering the permit P0140358 in the "Search Projects" search box.

Statement of Basis* For Air Pollution Title V Permit

*As defined in OAC rule 3745-77-01(MM): “Statement of basis” or “SOB” means a statement that sets forth the legal and factual basis for the draft [Title V] permit conditions (including references to the applicable statutory or regulatory provisions).”

Completing this form is intended to satisfy those requirements.

Facility ID:	0204010265
Facility Name:	Zehrco Plastics Inc. (Plant 2)
Facility Description:	Plastic parts manufacturing
Facility Address:	1501 West 47 th Street Ashtabula, OH 44004-0000
Permit #:	P0140358

This facility is subject to Title V because it is major for:

☐ Lead ☐ Sulfur Dioxide ☐ Carbon Monoxide ☒ Volatile Organic Compounds ☐ Nitrogen Oxides

☐ Particulate Matter $\leq$ 10 microns ☒ Single Hazardous Air Pollutant ☒ Combined Hazardous Air Pollutants ☐ GHG

And/or subject to:

☒ Maximum Available Control Technology Standard(s) ☐ GACT standard(s) that requires a Title V permit ☐ Title IV ☐ Opt-In source

A. Permit Background

1. Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(V)?

Yes X

No

Comments:

2. Discuss any **common control determinations** (this includes revisions to previous determinations), include justification, factors, and facts which led to the final decision.

Discussion: N/A

3. Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a **renewal** per OAC rule 3745-77-08(E). This includes identifying conditions from previous permits that are not included in the new permit.

PTI No.:

Affected EUs:

Discussion of changes from the previous Title V: N/A

4. Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a **minor modification** per OAC rules 3745-77-08(C)(1) or (2)

PTI No.:

Affected EUs:

Minor Modification Description: N/A

5. Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a **significant permit modification** per OAC rule 3745-77-08(C)(3)

PTI No.:

Affected EUs:

Significant Modification Description: N/A

6. Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a **reopening** per OAC rule 3745-77-08(D)

PTI No.:

Affected EUs:

Reopening for Cause for Description: N/A

7. Please identify the affected emissions unit(s) and pollutant(s) for which a **Compliance Assurance Monitoring (CAM)** Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.

Affected EUs: N/A

8. Please identify any federal **Consent Decree (CD)** that resulted in the addition of Title V T&Cs – include the CD Number, the CD Public Notice date (if known) and Ohio EPA Permit Number (if applicable, along with final permit issuance date) that incorporates the CD requirements.

CD No. N/A

Public
Notice
Date:

PTI No.

PTI Issuance Date:

9. Please identify any **complex or unusual rule applicability determination** that is not readily apparent in the permit T&Cs and warrants additional explanation in the Statement of Basis. If the discussion is included in a PTI Permit Strategy Write Up cite the Permit Number and copy/paste or summarize the determination here.

PTI No. N/A

Discussion:

10. Please identify any **streamlining determinations** within the permit. Include an identification of the subsumed limit(s) and an explanation of how the resulting limit is equivalent to or more stringent than those subsumed. If the discussion exists in a PTI Permit Strategy Write Up, cite the Permit Number and summarize the determination here. This would also be noted for specific emissions units identified in C.

PTI No. N/A

Discussion:

11. Please identify any current **enforcement actions** to address violations at the facility resulting in a compliance plan and schedule.

Director's Final
Findings and Orders;
AGO Consent Decree;
or U.S. EPA Consent
Decree Date: N/A

List the Order/Injunctive Relief number from the associated enforcement document and provide a description:

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.3	N/A	40 CFR Part 63 Subpart PPPP	R001 is subject to MACT subpart PPPP and subpart A.

B.4	N/A	40 CFR Part 63 Subpart WWWW	P002, P004 – P007, P009 - P029, P031 – P036, P039 – P042, T003 – T010 are subject to MACT subpart WWWW and subpart A.
B.5	21-25	N/A	Requirements of OAC rule 3745-21-25

C. Emissions Unit Terms and Conditions

Key: EU = emissions unit ID ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit) OR = operational restriction M = monitoring requirements ENF = did noncompliance issues drive the monitoring requirements?	R = record keeping requirements Rp = reporting requirements ET = emission testing requirements (not including compliance method terms) Misc = miscellaneous requirements
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Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
Section C.1: P004, New SMC (Sheet Molding Compound) Machine											
P004	VOC emissions from uncontrolled SMC machine < 25.0 tons per rolling 12-month period.	21-05 (D)(9)	N	N	Y	Y	Y	N	N	N	M, R, Rp - Tracking SMC paste and VOC emissions information.
P004	Work practice for SMC machine	21-25 (D)(1), Table 1, 21-07 (M)(3)(g) and MACT subpart WWW	N	Y	Y	Y	Y	N	N	N	OR - resin delivery system to the doctor box must be closed or covered, and a nylon containing film must be used to enclose SMC, M, R, Rp- Tracking work practice performances for SMC manufacturing operations.

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
		Table 4									
Section C.2: R001, Paint Spray Booth Four Compartment											
R001	Use of filter to control particulate emissions	17-11 (C)	N	Y	Y	Y	Y	N	N	N	OR – Use of dry filters when R001 is in operation M, R, Rp - Tracking for use of the dry filters when unit was in operation and in accordance with manufacture’s recommendations, instruction, and/or operating manuals.
R001	0.16 lb organic HAP emitted /lb of coating solids used during each 12-month period for general use coating operation	31-05 (A)(3) and MACT subpart PPPP	N	Y	Y	Y	Y	N	N	N	OR – compliance options for without add-on controls unit M, R, Rp - Tracking coating information

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
Section C.3: EU Group - BMC and Mixers: P002, P005, P006 and P007											
P005	8 lbs/hr, 32 lbs/day, and 5.84 TPY of OC, including cleanups	31-05 (A)(3)	N	N	Y	Y	Y	N	N	N	M, R, Rp - Tracking coatings, cleanups, and OC emissions information
P006	2.62 lbs/hr, 40 lbs/day, and 7.3 TPY of OC from mixing operation	31-05 (A)(3)	N	N	Y	Y	Y	N	N	N	M, R, Rp - Tracking coatings and OC emissions information
P006	2.4 lbs/hr, 19.2 lbs/day, and 3.51 TPY of	31-05 (A)(3)	N	N	Y	Y	Y	N	N	N	M, R, Rp - Tracking cleanups and OC emissions information

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	OC from cleanups										
P007	2.42 lbs/hr, 40 lbs/day, and 7.3 TPY of OC from mixing operation	31-05 (A)(3)	N	N	Y	Y	Y	N	N	N	M, R, Rp - Tracking coatings and OC emissions information
P007	19.8 lbs/day and 3.61 TPY of OC from cleanups	31-05 (A)(3)	N	N	Y	Y	Y	N	N	N	M, R, Rp - Tracking cleanups and OC emissions information
P002, P005, P006, & P007	Work practice for mixers	21-25 (D)(1), Table 1 and	N	Y	Y	Y	Y	N	N	N	OR - use mixer covers with no visible gaps, and close mixer vents and keep mixer covers closed when mixing M, R, Rp- Tracking work practice performances for mixers.

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
		MACT subpart WWWW Table 4									
Section C.4: EU Group - Compression Molding: P031, P032, P033, P034, P035 and P036											
P031, P032, P033, P034, P035, & P036	NA	31-05 (A)(3)	N	N	Y	Y	Y	N	N	N	M, R, Rp- Tracking material usages and VOC/HAP emissions information.
P031, P032, P033, P034, P035, & P036	Work practices for compression molding operations	21-25 (D)(1), Table 1 and MACT subpart	N	Y	Y	Y	Y	N	N	N	uncover, unwrap or expose only one charge per mold cycle per compression molding machine M, R, Rp- Tracking work practices performances for compression molding operations.



Draft Title V Permit
Zehrco Plastics Inc. (Plant 2)
Permit Number: P0140358
Facility ID: 0204010265
Statement of Basis

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
		WWWW Table 4									
Section C.5: EU Group - Filament Winders: P045 and P046											
P045 & P046	NA	31-05 (A)(3)	N	N	Y	Y	Y	N	N	N	M, R, Rp- Tracking material usages and VOC/HAP emissions information.
P045 & P046	Tracking of resin and gel coat and VOC/HAP emissions	21-25 (D)(1), Table 2 and MACT subpart WWWW Table 3	N	N	Y	Y	Y	N	N	N	M, R, Rp- Records of resin and gel coat use and VOC/HAP content.
Section C.6: EU Group - Injection/Compression Molding: P040, P042, P044, P047, P048, P049, P050 and P051											



Draft Title V Permit
Zehrco Plastics Inc. (Plant 2)
Permit Number: P0140358
Facility ID: 0204010265
Statement of Basis

Emissions Unit Table

[illegible]

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
P009, P010, P012, P015, P016, P017, P018, P019, P020, P023, P028, & P029	14.2 lbs/day and 2.60 TPY of VOC/HAP emissions	31- 05(A)(3)	N	N	Y	Y	Y	N	N	N	M, R, Rp- Tracking material usages and VOC/HAP emissions information.
P011 & P013	2.7 lbs/day and 0.5 TPY of VOC/HAP emissions	31- 05(A)(3)	N	N	Y	Y	Y	N	N	N	M, R, Rp- Tracking material usages and VOC/HAP emissions information.
P014, P021, P022,	40 lbs/day and 7.30 TPY of	31- 05(A)(3)	N	N	Y	Y	Y	N	N	N	M, R, Rp- Tracking material usages and VOC/HAP emissions information.

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
P024, P025, P026, & P027	VOC/HAP emissions										
P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026,	Work practices for compression molding operations	21-25 (D)(1), Table 1 and MACT subpart WWW Table 4	N	Y	Y	Y	Y	N	N	N	uncover, unwrap or expose only one charge per mold cycle per compression molding machine M, R, Rp- Tracking work practices performances for compression molding operations.



Statement of Basis

[illegible]



**Environmental
Protection
Agency**

DRAFT

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

Facility ID:	0204010265
Permit Number:	P0140358
Permit Type:	Renewal
Issued:	10/01/2026
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

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

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Authorization

Facility ID:	0204010265
Facility Description:	Plastic parts manufacturing
Application Number(s):	A0081613
Permit Number:	P0140358
Permit Description:	Title V renewal for a plastic parts manufacturing facility.
Permit Type:	Renewal
Issue Date:	
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0130606

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

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

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Rd.
Twinsburg, OH 44087
(330)963-1200

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

John Logue
Director

List of Commonly Used Abbreviations

AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors	HVLP = high volume, low pressure	PER = Permit Evaluation Report
ASTM = American Society for Testing and Materials	LAER = lowest achievable emission rate	PM = particulate matter
BACT = Best Available Control Technology	lb(s)/hr = pound(s) per hour	PM ₁₀ = particulate matter with an aerodynamic diameter less than or equal to 10 microns
BAT = Best Available Technology	LDAR = leak detection and repair	PM _{2.5} = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
CAA = Clean Air Act	LPG = liquefied petroleum gas/propane	ppb = parts per billion
CAM = compliance assurance monitoring	MACT = maximum achievable control technology	ppm = parts per million
CEMS = continuous emissions monitoring system	MAGLC = maximum acceptable ground level concentration	PSD = Prevention of Significant Deterioration
CFC = chlorofluorocarbon	mg/m ³ = milligrams per cubic meter	psi = pounds per square inch
CFR = Code of Federal Regulations	MM = million	psia = pounds per square inch absolute
CH ₄ = methane	MMBtu = million British Thermal Units	PTE = potential-to-emit
CI = compression ignition	MSDS = material safety data sheet	PTI = Permit-to-Install
CO = carbon monoxide	MSW = municipal solid waste	PTIO = Permit-to-Install and Operate
CO ₂ = carbon dioxide	NAAQS = National Ambient Air Quality Standard	PTO = Permit-to-Operate
COM = continuous opacity monitor	NESHAP = National Emission Standard for Hazardous Air Pollutants	PWR = process weight rate
DAPC = Division of Air Pollution Control	NG = natural gas	RACM = reasonably available control measures
DO/LAA = District Office/Local Air Agency	ng/m ³ = nanograms per cubic meter	RACT = reasonably available control technology
dscf = dry standard cubic foot	NH ₃ = ammonia	RATA = relative accuracy test audit
EAC = emissions activity category	NMHC = non-methane hydrocarbons	RTO = regenerative thermal oxidizer
eDocs = electronic documents database	NMOC = non-methane organic compound	SB265 = Senate Bill 265
ERAC = Environmental Review Appeals Commission	NO = nitrogen oxide	scfm = standard cubic feet per minute
ESP = electrostatic precipitator	NO ₂ = nitrogen dioxide	SI = spark ignition
EU = emissions unit	NO _x = nitrogen oxides	SIP = State Implementation Plan
FEPTIO = Federally Enforceable Permit-to-Install and Operate	NSPS = New Source Performance Standard	SO ₂ = sulfur dioxide
FER = Fee Emissions Report	NSR = New Source Review	SSMP = startup, shutdown, and malfunction plan
FR = Federal Register	NTV = Non-Title V	TDS = total dissolved solids
GACT = generally achievable control technology	O&M = operation and maintenance	TLV = threshold limit value
GHG = greenhouse gases	OAC = Ohio Administrative Code	TO = thermal oxidizer
gr/dscf = grains per dry standard cubic foot	OC = organic compound	TPH = ton(s) per hour
H ₂ S = hydrogen sulfide	Ohio EPA = Ohio Environmental Protection Agency	TPY = ton(s) per year
H ₂ SO ₄ = sulfuric acid	ORC = Ohio Revised Code	TSP = total suspended particulates
HAP = hazardous air pollutant	Pb = lead	VE = visible particulate emissions
HCl = hydrogen chloride	PBR = Permit-By-Rule	VMT = vehicle miles traveled
HF = hydrogen fluoride	PCB = polychlorinated biphenyl	VOC = volatile organic compound
Hg = mercury	PE = particulate emissions	WPP = work practice plan
hp = horsepower	PEMS = predictive emissions monitoring system	µg/m ³ = micrograms per cubic meter

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under state law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting for State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30., Submitting Documents Required by this Permit

[Authority for term: ORC 3704.036(A)]

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

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

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

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

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



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

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

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

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

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

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

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

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation

occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

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

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

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

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

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

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.20, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northeast District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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

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

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

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

- (4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

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

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northeast District Office unless otherwise specified.

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

3. Reporting of Any Exceedance of a Federally Enforceable Emission Limitation or Control Requirement Resulting from Scheduled Maintenance

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

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

4. Risk Management Plans

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

- a) A compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) As part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

- a) 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 except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) The permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01 based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

- (2) The permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01 based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable; or
- (3) A combination of (1) and (2) above.

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

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

8. Fees

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

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit and shall not require a reopening of this permit.



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

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

- (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- 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 Ohio EPA DAPC, Northeast District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.
 - b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent consistent with A.13.d)(2)a. above.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d)(2)a. above.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [defined as "Title I modification" in OAC rule 3745-77-01], 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 Ohio EPA DAPC, Northeast District Office 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 Ohio EPA DAPC, Northeast District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

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

16. Emergencies

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

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

17. Off-Permit Changes

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

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as "insignificant activities and emissions levels" as defined in OAC rule 3745-77-01. Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

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

20. Permit-to-Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

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

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

[Authority for term: OAC rule 3745-77-01]

23. Title VI Provisions

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

- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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

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

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the Ohio EPA DAPC, Northeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (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 Ohio EPA DAPC, Northeast District Office. 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, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention Requirements Under State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining

to any emission of air contaminants, and determining compliance with any applicable state air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

27. Scheduled Maintenance/Malfunction Reporting for State-Only Requirements

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 Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northeast District Office must be notified in writing of any transfer of this permit.

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

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

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

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

- a) Where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) Where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) Where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee

cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northeast District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility Wide Terms and Conditions

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

- a) None.

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

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

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

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

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

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

4. The following EUs, as well as cleaning of equipment used in reinforced plastic composites manufacture, VOC-containing materials storage, and repair operations on reinforced plastic composites parts that are manufactured at the facility contained in this permit are subject to 40 CFR Part 63, Subpart WWWW, NESHAP for Reinforced Plastic Composites Production. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the e-CFR website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA NEDO.

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

EU ID	Operations, Property and/or Equipment Description
P010	Thermoset Compression Mold Press No. 5
P011	Thermoset Compression Mold Press No. 11
P012	Thermoset Compression Mold Press No. 14
P013	Thermoset Compression Mold Press No. 23
P014	Thermoset Compression Mold Press No. 38
P015	Thermoset Compression Mold Press No. 39
P016	Thermoset Compression Mold Press No. 40
P017	Thermoset Compression Mold Press No. 41
P018	Thermoset Compression Mold Press No. 42
P019	Thermoset Compression Mold Press No. 43
P020	Thermoset Compression Mold Press No. 44
P021	Thermoset Compression Mold Press No. 45
P022	Thermoset Compression Mold Press No. 47
P023	Thermoset Compression Mold Press No. 48
P024	Thermoset Compression Mold Press No. 49
P025	Thermoset Compression Mold Press No. 50
P026	Thermoset Compression Mold Press No. 51
P027	Thermoset Compression Mold Press No. 52
P028	Thermoset Compression Mold Press No. 53
P029	Thermoset Compression Mold Press No. 54
P031	Press #56 350 ton
P032	Press #57 Hull 300 ton
P033	Press #58 Hull 300 ton
P034	Press #59 200 ton
P035	Press #60 200 ton
P036	Press #10 25 ton
P038	500 tons Cincinnati Milacron Model 500-70 Plastic Injection Molding Machine. Press No.70
P039	700 tons Cincinnati MD700 Plastic Injection Molding Machine. Press No.71
P040	500 tons Krauss-Maffei Plastic Injection Molding Machine. Press No.72

EU ID	Operations, Property and/or Equipment Description
P041	375 tons Cincinnati MD375A Plastic Injection Molding Machine. Press No.73
P042	375 tons Cincinnati MD375B Plastic Injection Molding Machine 2. Press No.74
P044	500 tons Cincinnati Milacron Model 500-70, Plastic Injection Molding Machine. Press No. 75
P045	Filament Winder 1
P046	Filament Winder 2
P047	900 ton Compression Molding Press No. 61
P048	900 ton Compression Molding Press No. 62
P049	550 ton Compression Molding Press No. 63
P050	550 ton Compression Molding Press No. 64
P051	600 ton Compression Molding Press No. 65
T003	< 7500 gallons Resin Tank No. 3.
T004	< 7500 gallons Resin Tank No. 4.
T005	< 7500 gallons Resin Tank No. 5.
T006	< 7500 gallons Resin Tank No. 6.
T007	< 7500 gallons Resin Tank No. 7.
T008	< 7500 gallons Resin Tank No. 8.
T009	< 7500 gallons Resin Tank No. 9.
T010	< 7500 gallons Tank No. 10.

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

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

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

a) VOC control requirements:

- (1) The permittee shall meet the work practice standards in Table 1 of OAC rule 3745-21-25.
- (2) Currently, the facility has VOC emissions less than the threshold of one hundred (100) TPY from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, the permittee shall meet the VOC emissions limits in Table 2 of OAC rule 3745-21-25. The facility's VOC emissions threshold shall be calculated in accordance with OAC rule 3745-21-25(F) and section B.5.f).

- (3) If the facility has VOC emissions equal to or greater than the threshold of one hundred (100) TPY from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, the permittee shall reduce the total VOC emissions from these operations by at least ninety-five percent (95%) by weight. As an alternative to meeting 95% by weight reduction, the permittee may meet the VOC emissions limits in Table 3 of OAC rule 3745-21-25. The facility's VOC emissions threshold shall be calculated in accordance with OAC rule 3745-21-25(F) and section B.5.f).
- (4) Once the facility equals or exceeds the one hundred (100) tons of VOC per year threshold of OAC rule 3745-21-25(D)(3), it is always subject to the requirements of the OAC rule 3745-21-25(D)(3) and section B.5.a)(3).

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

b) **Recordkeeping Requirements:**

- (1) In accordance with OAC rule 3745-21-25(P)(1), the permittee shall keep the following records:
 - a. a copy of each applicability notification and compliance status report submitted to comply with this rule, including all documentation supporting any applicability or compliance status;
 - b. for operations listed in Table 2, 3, and 4 of OAC rule 3745-21-25 all data, assumptions, and calculations used to determine monomer contents and VOC emissions factors; and
 - c. a certified statement that operations are in compliance with the work practice standards specified in Table 1 of the rule, as applicable.

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

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

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

c) **Reporting Requirements:**

- (1) In accordance with OAC rule 3745-21-25(Q)(1) and (Q)(3), the permittee shall submit semiannual compliance status reports containing the following information:
 - a. Company name and address;
 - b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - c. Date of the report and beginning and ending dates of the reporting period;
 - d. If there are no deviations from any VOC emissions limitations and operating limits that apply and there are no deviations from the work practice standards in Table 1 of the

OAC rule 3745-21-25, a statement that there were no deviations from VOC emissions limitations, operating limits, or work practice standards during the reporting period;

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

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

- (a) Open molding;
- (b) Compression/injection molding;
- (c) Centrifugal casting;
- (d) Continuous lamination;
- (e) Continuous casting;
- (f) Polymer casting;
- (g) Pultrusion;
- (h) SMC manufacturing;
- (i) BMC manufacturing;
- (j) Mixing;
- (k) Cleaning of equipment used in reinforced plastic composites manufacture;
- (l) VOC-containing materials storage; and
- (m) Repair operations on reinforced plastic composites parts that are manufactured at the facility.

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

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

- (2) The semiannual compliance status reports shall be submitted in accordance with the reporting requirements in section A this permit.

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

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

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

- (4) In accordance with OAC rule 3745-21-25(Q)(5), the permittee shall report all deviations in the semiannual monitoring report as required in section A of this V permit. The semiannual compliance reports shall be submitted along with, or as part of, the semiannual monitoring report, including all required information concerning deviations from any VOC emission limitations, operating limits, or work practice standards in OAC rule 3745-21-25.

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

- (5) In accordance with OAC rule 3745-21-25(S)(1), the permittee of an affected operation, as described in section B.5.c)(1)e.i. above, shall notify the Ohio EPA NEDO (NEDO) in writing that such operation is subject the OAC rule 3745-21-25. The notification, which shall be submitted no later than sixty days after December 14, 2009, shall provide the following information:
- a. name and address of the owner or operator;
 - b. address (i.e., physical location) of the facility;
 - c. equipment description and Ohio EPA application number (if assigned) of the affected operation;
 - d. identification of the applicable requirements, the means of compliance, and the compliance date for the affected operation under OAC rule 3745-21-25; and
 - e. regarding a permit for the affected operation, whichever of the following is applicable:
 - i. submission of an application for an PTO, a permit modification, or an PTO renewal in accordance with OAC rule 3745-31-02; or
 - ii. submission of a statement of intent to submit an application for a Title V permit or modification of a Title V permit accordance with OAC rule 3745-77-02 or 3745-77-06, respectively.

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

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

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

- e) Procedures for determination of VOC emissions factors for reinforced plastic composites production operations and determination of monomer content of resins and gel coats.

- (1) In accordance with OAC rule 3745-21-25(E)(1), emissions factors are used to determine compliance with certain VOC emissions limits in table 2 and table 3 of OAC rule 3745-21-25 and to calculate VOC emissions. A person may use the equations in table 1 of 40 CFR Part 63, Subpart WWW to calculate such emissions factors or may use any VOC emissions factor approved by USEPA, such as emission factors or emission factor equations from AP-42. These equations and emissions factors are intended to provide a method for one to demonstrate compliance without the need to conduct a VOC emissions test. In lieu of these equations and emissions factors, the owner or operator can elect to use site-specific VOC emissions factors to demonstrate compliance and to calculate VOC emissions provided the site-specific VOC emissions factors are

incorporated in the facility's air emissions permit and are based on actual facility VOC emissions test data using the test procedures in 40 CFR 63.5850 or paragraph (C) of rule 3745-21-10 of the Administrative Code. Stack test data for the facility shall supersede emission factors and other emission estimating techniques.

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

- (2) In accordance with OAC rule 3745-21-25(E)(2), in order to determine the monomer content of resins and gel coats, the permittee may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in this following, as applicable:

- a. Include in the total monomer content each monomer compound that is present at 0.1 per cent by mass or more for OSHA-defined carcinogens, as specified in paragraph A.6.4.1 of 29 CFR 1910.1200, Appendix A and at 1.0 per cent by mass or more for other monomer compounds.
- b. If the monomer content is provided by the material supplier or manufacturer as a range, the permittee shall use the upper limit of the range for determining compliance. If a separate measurement of the total monomer content, such as an analysis of the material by USEPA Method 311 of 40 CFR Part 63, Appendix A, exceeds the upper limit of the range of the total monomer content provided by the material supplier or manufacturer, then the permittee shall use the measured monomer content to determine compliance.
- c. If the monomer content is provided as a single value, the permittee may use that value to determine compliance. If a separate measurement of the total monomer content is made and is less than two percentage points higher than the value for total monomer content provided by the material supplier or manufacturer, then the permittee still may use the provided value to demonstrate compliance. If the measured total monomer content exceeds the provided value by two percentage points or more, then the permittee shall use the measured total monomer content to determine compliance.

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

- f) Calculation of facility's VOC emissions threshold

- (1) In accordance with OAC rule 3745-21-25(F)(1), to calculate the facility's VOC emissions threshold in TPY for purposes of determining which requirements apply under OAC rule 3745-21-25(D), the permittee shall use the procedures in section B.5.f)(2) below. A facility's VOC emissions threshold pertains to the following operations: open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing. For facility's VOC emissions threshold, calculate VOC emissions prior to any add-on control device, and do not include VOC emissions from any resin or gel coat used in operations subject to the boat manufacturing NESHAP, 40 CFR Part 63, Subpart VVV, or from the manufacture of large parts as defined in OAC rule 3745-21-25(D)(4). This facility is an "existing facility".

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



- (2) In accordance with OAC rule 3745-21-25(F)(3), the permittee may use the procedures in either section B.5.f)(2)a or section B.5.f)(2)b below for the operations specified in section B.5.f)(1) above. If the emission factors for this facility have changed over the period of time prior to its initial compliance date due to incorporation of pollution-prevention control techniques, the facility may base the average emission factor on its operations as they exist on the compliance date. If the facility has accepted an enforceable permit limit that would result in less than one hundred TPY (per rolling, 12-month period) of VOC measured prior to any add-on controls, and can demonstrate that it will operate at that level subsequent to the compliance date, it can be deemed to be below the one hundred TPY threshold.
- a. Use a calculated emission factor
- Calculate a weighted average VOC emissions factor on a lbs/T of resin, monomer, or gel coat basis. Base the weighted average on the prior twelve months of operation. Multiply the weighted average VOC emissions factor by resin, monomer or gel coat use over the same period. The permittee may calculate this VOC emissions factor based on the equations in Table 1 to Subpart WWWW of 40 CFR Part 63, or the permittee may use any VOC emission factor approved by USEPA, such as emission factors or emission factor equations from AP-42, or site-specific VOC emissions factors if they are supported by VOC emissions test data. The organic HAP emission factors in Table 1 to Subpart WWWW of 40 CFR Part 63 are equivalent to the VOC emissions factors for this rule.
- b. Conduct performance testing
- Conduct performance testing using the test procedures in 40 CFR 63.5850 or paragraph (C) of rule 3745-21-10 of the Administrative Code to determine a site-specific VOC emissions factor in units of pounds of VOC per ton of resin, monomer, or gel coat used. Conduct the test under conditions expected to result in the highest possible VOC emissions. Multiply this factor by annual resin, monomer, or gel coat used to determine annual VOC emissions. This calculation shall be repeated and reported annually.
- [Authority for term: OAC rule 3745-21-25(F)(3) and OAC rule 3745-77-07(C)(1)]
- (3) In accordance with OAC rule 3745-21-25(F)(5), after the initial compliance date, the facility shall calculate VOC emissions over the 12-month period ending June thirtieth or December thirty-first, whichever date is the first date following the compliance date specified in section B.5.d) above. Subsequent calculations should cover the periods in the semiannual compliance reports.

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

C. Emissions Unit Terms and Conditions

1. P004, New SMC (Sheet Molding Compound) Machine
Operations, Property and/or Equipment Description:

The new sheet molding compound (SMC) machine. SMC paste and chopped fiber glass roving are cast onto a continuous nylon carrier film and are then covered by a nylon film for later use in the FRP molding presses.

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

(1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (A)(3) PTI 02-2866, issued on October 16 th , 1986, for EU P004.	The requirements of this rule include compliance with the requirements of OAC rule 3745-21-25 and 40 CFR Part 63, Subpart WWWW.
b.	OAC rule 3745-21-07(M)(3)(g)	See b)(2)a.
c.	OAC rule 3745-21-25	VOC emissions from uncontrolled SMC manufacturing machine shall be less than 25.0 tons per rolling, 12-month period. The work practice standards specified in Table 1 of this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4. See b)(2)b and c)(1).
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(1).

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

(2) Additional Terms and Conditions

- a. In accordance with OAC rule 3745-21-07(M)(5)(h), paragraph (M)(3)(g) of OAC rule 3745-21-07 shall not apply to this EU when all of the work practice standards as specified in c)(1) are met.
- b. In accordance with OAC rule 3745-21-25(D)(9), this EU is exempted from the requirement of OAC rule 3745-21-25(D)(8) because uncontrolled VOC emissions from this EU are less than 25.0 tons per rolling, 12-month period.

c) Operational Restrictions

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

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

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall keep the following records each month for this EU:

- a. the company identification of each SMC paste employed;
- b. the weight, in pounds of each SMC paste employed;
- c. the VOC content, in percent by weight, of each SMC paste employed;
- d. the monthly VOC emissions, in pounds per month, and shall be calculated as follows:

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

where:

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

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

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

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

i = subscript denoting an individual SMC paste;

n = the total number of different SMC pastes; and

e. the rolling, 12-month total VOC emissions, in TPY.

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

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

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

b. the monomer content of each SMC product.

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

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

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

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

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

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

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

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

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

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

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

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

e) Reporting Requirements

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

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

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

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

f) Testing Requirements

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

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

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

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

g) Miscellaneous Requirements

- (1) None.

2. R001, Paint Spray Booth Four Compartment

Operations, Property and/or Equipment Description:

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

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

(1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (A)(3) PTI 02-1805, issued on December 28 th , 1984, for EU R001.	The requirements of this rule include compliance with the requirements of OAC rule 3745-17-11(C) and 40 CFR Part 63, Subpart PPPP.
b.	OAC rule 3745-17-11(C)	See c)(1), c)(2), d)(1), d)(2), d)(3), d)(4), d)(5) and e)(2)a.
c.	40 CFR Part 63, Subpart PPPP 40 CFR 63.4480 – 63.4581	In accordance with 40 CFR 63.4490(b)(1), organic HAP emissions shall be limited to no more than 0.16 pound organic HAP emitted per pound coating solids used during each 12-month compliance period for each general use coating operation. See b)(2)a and b)(2)b.
d.	40 CFR 63.1 - 63.15	The General Provisions that apply are specified in Table 2 of 40 CFR Part 63, Subpart PPPP.

- (2) Additional Terms and Conditions

- a. The permittee shall comply with the applicable provisions of the NESHAP for Surface Coating of Plastic Parts and Products, as promulgated by the USEPA under 40 CFR Part 63, Subpart PPPP.



The final rules found in 40 CFR Part 63, Subpart PPPP establish NESHAP (HAP), work practice standards, operating limitations, and compliance requirements for plastic parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of plastic parts and products:

- i. all coating operations as defined in 40 CFR 63.4581;
- ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
- iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and
- iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

- b. For any coating operation(s) that is meeting the emission limitations in 40 CFR 63.4490 by using the “without add-on control” option, the permittee shall maintain the EU(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month and on a rolling, 12-month basis following the initial compliance period, i.e., the mass average organic HAP emission rate shall be calculated each month as required in 40 CFR 63.4551 and 63.4552.

c) Operational Restrictions

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

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

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

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

- (3) If the permittee can meet the emission limitation(s) contained in 40 CFR 63.4490 without add-on controls, by calculating the rolling, 12-month HAP emission rate at the end of each month, the permittee shall not be required to meet the operating limits contained in 40 CFR 63.4492 or work practice standards contained in 40 CFR 63.4493.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR 63.4492(a), and 40 CFR 63.4493(a)]

- (4) The permittee shall operate and maintain, at all times, any EU contained in this permit in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the operator/permittee reduce emissions to the greatest extent which



is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.

The requirement to minimize emissions during any period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times, if it is not consistent with safety and good air pollution control practices; nor does it require the operator/permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. The operational and maintenance requirements contained in the NESHAP are enforceable, independent of the emissions limitations or other requirements of the rule.

Determination of whether such operation and maintenance procedures are being applied shall be based on information requested by and made available to the Director (Ohio EPA NEDO), which may include, but shall not be limited to: monitoring results, operation and maintenance procedures (including the startup, shutdown, and malfunction plan or other standard operating procedures), operation and maintenance records, and inspection of the facility.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.6(e)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

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

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

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

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

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

- (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;

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

d. the name of person who performed the inspection.

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

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

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

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

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

- a. 40 CFR Part 63, Subpart PPPP, including section 63.4530;
- b. 40 CFR Part 63, Subpart PPPP, including section 63.4531;
- c. 40 CFR Part 63, Subpart PPPP, including section 63.4550;
- d. 40 CFR Part 63, Subpart PPPP, including section 63.4551; and
- e. 40 CFR Part 63, Subpart PPPP, including section 63.4552.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.4530, 40 CFR 63.4531, 40 CFR 63.4550, 40 CFR 63.4551, and 40 CFR 63.4552]

e) **Reporting Requirements**

- (1) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart PPPP, including sections 63.4510, 63.4520, 63.4551, and 63.4530.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.4510, 40 CFR 63.4520, 40 CFR 63.4551, and 40 CFR 63.4530]

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the EU(s) was/were in operation; and
 - b. any monthly record showing that HAP emissions from this EU exceeded the limit in b)(1)c and the actual HAP emissions from each such month.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements as specified in section A of this permit.



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

f) Testing Requirements

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

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

g) Miscellaneous Requirements

(1) None.

3. EU Group - BMC and Mixers: P002, P005, P006 and P007

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

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

(1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 02-2866, issued on October 16th, 1986, for EU P002. PTI 02-9122, issued on June 2nd, 2005, for EU P005. PTI 02-0566, issued on November 6th, 1996, for EU P006. PTI 02-2552, issued on December 21st, 1999, for EU P007.	The requirements of this rule include compliance with the requirements of OAC rule 3745-21-25 and 40 CFR Part 63, Subpart WWWW. See b)(2)a.



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

(2) Additional Terms and Conditions

a. OC emissions shall not exceed the following:

- i. For EU P005, 8 lbs/hr, 32 lbs/day, and 5.84 TPY, including cleanup materials.
- ii. For EU P006:
 - (a) 2.62 lbs/hr, 40 lbs/day, and 7.3 TPY from the mixing operation; and
 - (b) 2.4 lbs/hr, 19.2 lbs/day, and 3.51 TPY from cleanup materials.
- iii. For EU P007:
 - (a) 2.42 lbs/hr, 40 lbs/day, and 7.3 TPY from the mixing operation; and
 - (b) 19.8 lbs/day, and 3.61 TPY from cleanup materials.

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

c) Operational Restrictions

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

- a. Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1.0 inch are permissible around mixer shafts and any required instrumentation;
- b. Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a ninety-five per cent (95%) efficient control device are exempt from this requirement; and

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

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

d) **Monitoring and/or Recordkeeping Requirements**

- (1) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in PTI 02-9122, issued on June 2, 2005 for EU P005, PTI 02-0566, issued on November 6, 1996 for EU P006, and PTI 02-2552 issued on December 21st, 1999 for EU P007: d)(2). The monitoring and record keeping requirements contained in the above-referenced PTIs are subsumed into the monitoring and record keeping requirements of this PTO, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the PTI.

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

- (2) The permittee shall collect and record the following information each day for each EU:
 - a. The company identification of each mold compound and each cleanup material employed;
 - b. The weight of each mold compound employed, in lbs/day;
 - c. The OC content of each mold compound, in percent by weight;
 - d. The volume of each cleanup material employed, in gallons;
 - e. The OC content of each cleanup material, in lbs/gallon;
 - f. The volume of each waste cleanup material collected for reuse or disposal, in gallons;
 - g. The volume of each evaporated cleanup material, which is calculated by subtracting the volume of waste cleanup material employed from the volume of cleanup material reused or disposed of, as “d” – “f”, in gallons;
 - h. The number of hours the EU was operated;
 - i. The OC emissions from cleanup materials, in lbs/day, calculated as following:

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

where:

E_c = daily OC emissions from cleanup materials, in lbs/day;

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

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

j = subscript denoting an individual cleanup material; and

m = the total number of different cleanup materials.

- j. The OC emissions from mixing operations, in lbs/day, calculated as specified below:

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

where:

E_M = total OC emissions from all mold compound materials, in lbs/day;

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

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

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

i = subscript denoting an individual mold compound material; and

n = the total number of different mold compound materials.

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

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

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

- ii. For EUs P006 and P007,

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

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

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

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

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

- a. whether the EU was in operation;

- b. whether the mixer cover was employed, except when adding materials or changing covers to the mixing vessels;
- c. whether there was a visible gap present in the mixer cover, except the gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation; and
- d. whether the mixer vent was open, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety.

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

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

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

e) **Reporting Requirements**

- (1) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in PTI 02-9122, issued on June 2, 2005 for EU P005, PTI 02-0566, issued on November 6, 1996 for EU P006, and PTI 02-2552, issued on December 21st, 1999 for EU P007: e)(2). The reporting requirements contained in the above-referenced PTIs are subsumed into then reporting requirements of this PTO, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the PTI.

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

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. an identification of each day during which the average hourly OC emissions exceeded the following, and the actual hourly OC emissions for each such day:
 - i. 8 lbs/hr of OC emissions from EU P005 including cleanup materials;
 - ii. 2.62 lbs/hr of OC emissions from EU P006's mixing operation;
 - iii. 2.4 lbs/hr of OC emissions from EU P006's cleanup materials; and
 - iv. 2.42 lbs/hr of OC emissions from EU P007's mixing operation.
 - b. an identification of each day during which the daily OC emissions exceeded the following, and the actual daily OC emissions for each such day:
 - i. 32 lbs/day of OC emissions from EU P005 including cleanup materials;
 - ii. 40 lbs/day of OC emissions from mixing operation of EUs P006 and P007;
 - iii. 19.2 lbs/day of OC emissions from cleanup materials used in EU P006; and
 - iv. 19.8 lbs/day of OC emissions from cleanup materials used in EU P007.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements as specified in section A of this permit.

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

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

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

f) **Testing Requirements**

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

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

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

a. Emission Limitation:

OC emissions from EU P005 shall not exceed 8 lbs/hr including cleanup materials.

Applicable Compliance Method:

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

b. Emission Limitation:

OC emissions from EU P005 shall not exceed 32 lbs/day including cleanup materials.

Applicable Compliance Method:

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

c. Emission Limitation:

Hourly OC emissions from mixing operations shall not exceed:

2.62 lbs/hr from EU P006; and

2.42 lbs/hr from EU P007.



Applicable Compliance Method:

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

d. Emission Limitation:

OC emissions from cleanup materials used in EU P006 shall not exceed 2.4 lbs/hr.

Applicable Compliance Method:

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

e. Emission Limitation:

Daily OC emissions from mixing operations shall not exceed:

40 lbs/day for EU P006; and

40 lbs/day for EU P007.

Applicable Compliance Method:

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

f. Emission Limitation:

Daily OC emissions from cleanup materials shall not exceed:

19.2 lbs/day from EU P006; and

19.8 lbs/day from EU P007.

Applicable Compliance Method:

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

g. Emission Limitation:

OC emissions from EU P005 shall not exceed 5.84 TPY including cleanup materials.

Applicable Compliance Method:

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

h. Emission Limitation:

Annual OC emissions from mixing operations shall not exceed:

7.3 TPY from EU P006; and

7.3 TPY from EU P007.



Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2)j and shall be the summation for the calendar year divided by 2000 lbs/T.

i. Emission Limitation:

Annual OC emissions from cleanup materials shall not exceed:

3.51 TPY from EU P006; and

3.61 TPY from EU P007.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2)i and shall be the summation for the calendar year divided by 2000 lbs/T.

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

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

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

g) Miscellaneous Requirements

- (1) None.

4. EU Group - Compression Molding: P031, P032, P033, P034, P035 and P036

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

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

(1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii) PTI P0103952, issued on February 4 th , 2009, for EUs P031, P032, P033, P034, P035, and P036.	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the uncontrolled PTE from each EU is less than 10 TPY.
b.	OAC rule 3745-21-07(M)	See b)(2)a.
c.	OAC rule 3745-21-25	The work practice standards specified in Table 1 of this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4. See c)(1).



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

(2) Additional Terms and Conditions

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

c) Operational Restrictions

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

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

d) Monitoring and/or Recordkeeping Requirements

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

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

- (2) The permittee shall maintain the following daily records for each EU:

- a. the identification of each mold compound employed in the EU;
- b. the weight of each mold compound employed in the EU;

- c. the percent of available VOC/HAP, by weight, in each mold compound; and
- d. the daily VOC/HAP emissions, calculated by the following equation, in pounds per day:

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

where:

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

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

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

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

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

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

- (3) The permittee shall conduct daily inspections of each EU and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in c)(1) and shall include the following information:
 - a. whether the EU was in operation;
 - b. whether the permittee uncovered, unwrapped, or exposed more than one charge per mold cycle per compression/injection molding machine as specified in section c)(1) above; and
 - c. information on the duration and cause of each deviation and the corrective action taken.

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

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

63.5915(a)	copy of compliance notification(s) and report(s)
63.5915(d)	certified statement of compliance with work practice requirements
63.5920(a) – (d)	record keeping format and retention requirements

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

e) **Reporting Requirements**

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



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

- (2) The permittee must submit semiannual compliance reports:
- a. if there are no deviations from the work practice standard in c)(1), provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., the facility had uncovered, unwrapped or exposed only one charge per mold cycle per compression molding machine);
 - b. if there were deviations with any of the work practice standard in c)(1), provide the total operating time of each EU during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

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

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

- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. None.
- g) Miscellaneous Requirements
- (1) None.

5. EU Group - Filament Winders: P045 and P046

EU ID	Operations, Property and/or Equipment Description
P045	Filament Winder 1
P046	Filament Winder 2

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

(1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii) PTI P0128148, issued on April 10 th , 2020, for EUs P045 and P046.	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the uncontrolled PTE from each EU is less than 10 TPY.
b.	OAC rule 3745-21-07(M)	See b)(2)a.
c.	OAC rule 3745-21-25	See b)(2)b, b)(2)c, and b)(2)d.
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	This is an existing facility. The permittee shall meet the organic HAP emissions limits in Table 3 of Subpart WWWW. See b)(2)e and b)(2)f.
e.	40 CFR 63.1 - 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

- (2) Additional Terms and Conditions

- a. EUs, P045 and P046, will be commenced installation after the effective date of OAC rule 3745-21-07(M). In accordance with OAC rule 3745-21-07(M)(3)(c)(i), these EUs are not subject to the requirements of OAC rule 3745-21-07(M)(2).



- b. Currently, the facility has VOC emissions less than the threshold of one hundred tons of VOC per year from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing operations. The permittee shall meet the VOC emissions limits in Table 2 of OAC rule 375-21-25 and in section b)(2)d below.
- c. The permittee shall meet the VOC emissions limits specified by type of operation and resin application method in the following table for VOC emissions less than the threshold of 100 TPY:

Type of operation	Resin application method or gel coat type	VOC Emissions limit ¹
1. open molding: corrosion-resistant and/or high strength (CR/HS)	a. mechanical resistant application	113 lb/ton
	b. filament application	171 lb/ton
	c. manual resin application	123 lb/ton
2. open molding: non-CR/HS	a. mechanical resin application	88 lb/ton
	b. filament application	188 lb/ton
	c. manual resin application	87 lb/ton
3. open molding: tooling	a. mechanical resin application	254 lb/ton
	b. manual resin application	157 lb/ton
4. open molding: low-flame spread/ low-smoke products	a. mechanical resin application	497 lb/ton
	b. filament application	270 lb/ton
	c. manual resin application	238 lb/ton
5. open molding: shrinkage controlled resins ²	a. mechanical resin application	354 lb/ton
	b. filament application	215 lb/ton
	c. manual resin application	180 lb/ton
6. open molding: gel coat ³	a. tooling gel coat	440 lb/ton
	b. white/off white pigmented gel coat	267 lb/ton
	c. all other pigmented gel coat	377 lb/ton
	d. CR/HS or high performance gel coat	605 lb/ton
	e. fire retardant gel coat	854 lb/ton
	f. clear production gel coat	522 lb/ton

¹VOC emissions limits for open molding are expressed as pounds of VOC per ton of resin or gel coat (lbs/ton). The operation shall be at or below these values based on a twelve-month rolling average.

²This emission limit applies regardless of whether the shrinkage controlled resin is used as a production resin or a tooling resin.

³If applying gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If using multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, the owner or operator may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors

- d. If the facility has VOC emissions equal to or greater than the threshold of one hundred tons of VOC per year from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing operations, the permittee shall reduce the total VOC emissions from these operations by at least ninety-five per cent by weight. As an alternative to meeting ninety-five per cent by weight, the permittee may meet the VOC emissions limits in Table 3 of OAC rule 3745-21-25.
- e. In accordance with 40 CFR §63.5805 (b), the permittee shall meet the organic HAP emissions limits in Table 3 of 40 CFR Part 63, subpart WWWW, regardless of the quantity of HAP emitted.
- f. As specified in 40 CFR §63.5805 (b) and Table 3 of 40 CFR Part 63, subpart WWWW, the permittee shall meet the following organic HAP emissions limits for new open molding sources emitting less than 100 TPY of HAP:

Type of operation	Resin application method or gel coat type	Organic HAP Emissions limits ¹
1. open molding: corrosion-resistant and/or high strength (CR/HS)	a. mechanical resistant application	113 lb/ton
	b. filament application	171 lb/ton
	c. manual resin application	123 lb/ton
2. open molding: non-CR/HS	a. mechanical resin application	88 lb/ton
	b. filament application	188 lb/ton
	c. manual resin application	87 lb/ton
3. open molding: tooling	a. mechanical resin application	254 lb/ton
	b. manual resin application	157 lb/ton
4. open molding: low-flame spread/	a. mechanical resin application	497 lb/ton
	b. filament application	270 lb/ton

low-smoke products	c. manual resin application	238 lb/ton
5. open molding: shrinkage controlled resins ²	a. mechanical resin application	354 lb/ton
	b. filament application	215 lb/ton
	c. manual resin application	180 lb/ton
6. open molding: gel coat ³	a. tooling gel coat	440 lb/ton
	b. white/off white pigmented gel coat	267 lb/ton
	c. all other pigmented gel coat	377 lb/ton
	d. CR/HS or high performance gel coat	605 lb/ton
	e. fire retardant gel coat	854 lb/ton
	f. clear production gel coat	522 lb/ton

¹Organic HAP emissions limits for open molding are expressed as lb/ton. The permittee must be at or below these values based on a twelve-month rolling average.

²This emission limit applies regardless of whether the shrinkage controlled resin is used as a production resin or a tooling resin.

³If the permittee only apply gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If you use multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, you may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall utilize one or more compliance options, as specified in 40 CFR 63.5810 to demonstrate compliance with the emission standards for open molding in Table 3 of this subpart, as described in the following sections:

63.5810(a)	individual resin or gel coat, as applied, emissions limit
63.5810(b)	on average, the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type
63.5810(c)	weighted average emission limit
63.5810(d)	organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type

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

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

63.5895(c) – (d)	records of resin and gel coat use, organic HAP content and operation where resin is used resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission as defined in paragraph (a) of section 63.5810. However, the permittee must retain the records of resin and gel coat organic HAP content and must include the list of these resins and gel coats and identify the application methods in the semiannual compliance reports.
63.5900(a)(2)	demonstrate continuous compliance with HAP emission limits listed in Table 3 or 5.
63.5915(a)	copy of compliance notification(s) and report(s)
63.5915(c)	records of all calculations and data used to determine organic HAP emissions factors or average organic HAP contents for operations and application methods as specified under 63.5810
63.5920(a) – (e)	record keeping format and retention requirements

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

- (3) The permittee shall utilize one of the following methods, as specified in OAC rule 3745-21-25(G) to demonstrate compliance with the emission limits for open molding in Table 2 of OAC rule 3745-21-25 and section b)(2)c above:

OAC rule 3745-21-25(G)(1)	individual resin or gel coat, as applied, emissions limit
OAC rule 3745-21-25(G)(2)	on average, the individual VOC emissions limits for each unique combination of operation type and resin application method or gel coat type
OAC rule 3745-21-25(G)(3)	weighted average VOC emission limit
OAC rule 3745-21-25(G)(4)	VOC emissions limit for one application method and use the same resin(s) for all application methods of that resin type

The permittee may use different compliance options for the different operations listed in Table 2 of OAC rule 3745-21-25 and section b)(2)c above. The necessary calculation shall be completed with thirty days after the end of each month. The permittee may switch between the compliance options in OAC rule 3745-21-25 (G)(1) to (G)(2). When the permittee changes to an option based on a 12-month rolling average, the permittee shall base the average on the previous 12 months of data calculated using the compliance option the permittee is changing to, unless the permittee was previously using an option that did not require the permittee to maintain records of resin and gel coat use. In this case, the permittee shall immediately begin

collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

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

- (4) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25, including the following sections:

OAC rule 3745-21-25(O)(b)	records of resin and gel coat use, monomer content and operation where resin is used
OAC rule 3745-21-25(O)(c)	resins and gel coats use are not required, when demonstrating compliance with (G)(1) limits, as applied, but include a list of resins and gel coats and identify their application methods in the semiannual compliance reports
OAC rule 3745-21-25(P)(1)(a)	a copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status
OAC rule 3745-21-25(P)(1)(c)	for operations listed in Tables 2, 3, and 4 of OAC rule 3745-21-25 all data, assumptions, and calculations used to determine monomer contents and VOC emissions factors
OAC rule 3745-21-25(P)(4)	record keeping retention requirements

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

- (5) The permittee shall maintain the following monthly records for this EU:
- the identification of each resin/gelcoat applied;
 - weight of each resin/gelcoat applied (a ton of resin/gelcoat is before the additions of additives such as powders, fillers, fiber glass...etc., but includes additional monomer added to resin);
 - the percent of VOC monomer(s), by weight, (e.g., styrene and methyl methacrylate) of each resin/gelcoat applied; and
 - the total VOC emission rate for all resins/gelcoats applied, as calculated by the following equation, in pounds per month:

$$VOC(lbs/month) = (EF) \sum_{i=0}^n (W)i$$

where:

W = weight of each resin or gelcoat, i, applied (a ton of resin or gelcoat is before the additions of additives such as powders, fillers, glass...etc, but include monomer additions), as recorded in d)(5)b above;

i = a specific resin or gelcoat applied during the month;

n = total number of resins and gelcoats applied during the month; and

EF = emissions factor(s), which is specified by type of operation and resin application method and gel coat type in Table 1 of Subpart WWW of 40 CFR 63. For nonvapor-suppressed resin with less than 33% organic HAP (for nonatomized gel coat materials with less than 19% organic HAP),

$$EF = 0.126 \times \%HAP \times 2000$$

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

e) Reporting Requirements

- (1) The permittee shall submit semiannual reports and such other notifications and reports to the Director (the Ohio EPA eBusiness Center, Air Services) as are required in 40 CFR Part 63, Subpart WWW, pursuant to the following sections:

63.5905(a)	all applicable notification in Table 13.
63.5905(b)	15-day notification of change(s)
63.5910(a) – (i) and Table 14	semiannual compliance reports requirements
63.5912(c)	initial semiannual compliance reports date
63.5912(d) – (f)	report submission procedures

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

- (2) The permittee shall submit semiannual reports and such other notifications and reports to the Director (the Ohio EPA eBusiness Center, Air Services) as are required in OAC rule 3745-21-25, pursuant to the following sections:

OAC rule 3745-21-25(Q)(1) – (Q)(2)	semiannual compliance reports
OAC rule 3745-21-25 (Q)(3)(a) – (Q)(3)(h)	content of semiannual compliance reports
OAC rule 3745-21-25(O)(2)(c)	list individual resins and gelcoats and application methods in semiannual compliance reports

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

f) Testing Requirements

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

a. Emission Limitation:

Type of operation	Resin application method or gel coat type	Organic HAP Emissions limit
1. open molding: corrosion-resistant and/or high strength (CR/HS)	a. mechanical resistant application	113 lb/ton
	b. filament application	171 lb/ton
	c. manual resin application	123 lb/ton
2. open molding: non-CR/HS	a. mechanical resin application	88 lb/ton
	b. filament application	188 lb/ton
	c. manual resin application	87 lb/ton
3. open molding: tooling	a. mechanical resin application	254 lb/ton
	b. manual resin application	157 lb/ton
4. open molding: low-flame spread/ low-smoke products	a. mechanical resin application	497 lb/ton
	b. filament application	270 lb/ton
	c. manual resin application	238 lb/ton
5. open molding: shrinkage controlled resins	a. mechanical resin application	354 lb/ton
	b. filament application	215 lb/ton
	c. manual resin application	180 lb/ton
6. open molding: gel coat	a. tooling gel coat	440 lb/ton
	b. white/off white pigmented gel coat	267 lb/ton
	c. all other pigmented gel coat	377 lb/ton
	d. CR/HS or high performance gel coat	605 lb/ton
	e. fire retardant gel coat	854 lb/ton
	f. clear production gel coat	522 lb/ton

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections d)(1) and d)(2) above, as well as organic HAP emission factors as

determined based upon 63.5796 and Table 1, and organic HAP contents in resins/gel coats as determined based upon 63.5797.

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

b. Emission Limitation:

Type of operation	Resin application method or gel coat type	VOC Emissions limit
1. open molding: corrosion-resistant and/or high strength (CR/HS)	a. mechanical resistant application	113 lb/ton
	b. filament application	171 lb/ton
	c. manual resin application	123 lb/ton
2. open molding: non-CR/HS	a. mechanical resin application	88 lb/ton
	b. filament application	188 lb/ton
	c. manual resin application	87 lb/ton
3. open molding: tooling	a. mechanical resin application	254 lb/ton
	b. manual resin application	157 lb/ton
4. open molding: low-flame spread/ low-smoke products	a. mechanical resin application	497 lb/ton
	b. filament application	270 lb/ton
	c. manual resin application	238 lb/ton
5. open molding: shrinkage controlled resins	a. mechanical resin application	354 lb/ton
	b. filament application	215 lb/ton
	c. manual resin application	180 lb/ton
6. open molding: gel coat	a. tooling gel coat	440 lb/ton
	b. white/off white pigmented gel coat	267 lb/ton
	c. all other pigmented gel coat	377 lb/ton
	d. CR/HS or high performance gel coat	605 lb/ton
	e. fire retardant gel coat	854 lb/ton
	f. clear production gel coat	522 lb/ton

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections d)(3) and d)(4) above.

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

g) Miscellaneous Requirements

(1) None.

6. EU Group - Injection/Compression Molding: P040, P042, P044, P047, P048, P049, P050 and P051

EU ID	Operations, Property and/or Equipment Description
P040	500 tons Krauss-Maffei Plastic Injection Molding Machine. Press No.72
P042	375 tons Cincinnati MD375B Plastic Injection Molding Machine 2. Press No.74
P044	500 ton Cincinnati Milacron Model 500-70, Plastic Injection Molding Machine. Press No. 75
P047	900 Ton Compression Molding Press No.61
P048	900 Ton Compression Molding Press No.62
P049	550 Ton Compression Molding Press No.63
P050	550 Ton Compression Molding Press No.64
P051	600 Ton Compression Molding Press No.65

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

(1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii) PTI P0115872, issued on December 18th, 2013, for EUs P040 and P042. PTI P0122526, issued on June 15th, 2017, for EU P044.	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the uncontrolled PTE from each EU is less than 10 TPY



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	PTI P0128918, issued on September 3 rd , 2020, for EUs P047, P048, P049, P050 and P051.	
b.	OAC rule 3745-21-07(M)	See b)(2)a.
c.	OAC rule 3745-21-25	The work practice standards specified in Table 1 of this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4. See c)(1).
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(1).
e.	40 CFR 63.1 - 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

- a. EUs P040, P042, P044, P047, P048, P049, P050, and P051 will commence installation after the effective date of OAC rule 3745-21-07(M). In accordance with OAC rule 3745-21-07(M)(3)(c)(i), these EUs are not subject to the requirements of OAC rule 3745-21-07(M)(2).

c) Operational Restrictions

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

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

d) Monitoring and/or Recordkeeping Requirements

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

63.5915(a)	copy of compliance notification(s) and report(s)
63.5915(d)	certified statement of compliance with work practice requirements
63.5920(a) – (d)	record keeping format and retention requirements

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

- (2) The permittee shall maintain the following monthly records for each EU:
- a. the identification of each molding compound;
 - b. the weight of each molding compound employed;
 - c. the percent of VOC monomer(s), by weight, of each molding compound employed;
 - d. the total VOC emissions, defined as VOC, shall be calculated by the following equation, in pounds per month:

$$\text{VOCs} \left(\frac{\text{lbs}}{\text{month}} \right) = (\text{EFs}) \sum_1^n [(\text{Ps})(\text{W})]_i$$

where:

EFs = emission factor, which is 1.15% of the available VOC monomer content (weight) for BMC materials, as documented in ANSI/ACMA/ICPA UEF-1-2011a, or the most recent factor should that factor be updated;

Ps = the percent of VOC monomer of each molding compound employed, as recorded in d)(2)c;

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

i = a specific molding compound employed during the month; and

n = total number of molding compound employed during the month.

[Authority for term: OAC rule 3745-77-07(C)(1), PTI P0112988, PTI P0122526 and P0128918]

- (3) The permittee shall conduct daily inspections of each EU and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in c)(1) and shall include the following information:
- a. whether the EU was in operation;
 - b. whether the permittee uncovered, unwrapped, or exposed more than one charge per mold cycle per compression/injection molding machine as specified in section c)(1) above; and

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

[Authority for term: OAC rule 3745-77-07(C)(1), PTI P0112988, PTI P0122526 and P0128918]

e) Reporting Requirements

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

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

- (2) The permittee must submit semiannual compliance reports for EUs P038, P039, P040, P041, P042, P044, P047, P048, P049, P050, and P051:
 - a. if there are no deviations from the work practice standard in c)(1), provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., the facility had uncovered, unwrapped or exposed only one charge per mold cycle per compression molding machine); and
 - b. if there were deviations with any of the work practice standard in c)(1), provide the total operating time of each EU during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

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

[Authority for term: OAC rule 3745-77-07(C)(1), PTI P0112988, PTI P0122526 and P0128918]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. None.

g) Miscellaneous Requirements

- (1) None.

7. EU Group - Thermoset Compression Mold Press: P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028 and P029

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

EU ID	Operations, Property and/or Equipment Description
P029	Thermoset Compression Mold Press No. 54

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

(1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 02-22186, issued on November 14 th , 2006, for EUs P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028 and P029.	See b)(2)a.
b.	OAC rule 3745-21-07(M)	See b)(2)b.
c.	OAC rule 3745-21-25	The work practice standards specified in Table 1 of this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4. See c)(1).
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(1).
e.	40 CFR 63.1 - 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

a. VOC/HAP emissions shall not exceed the following:

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

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

c) Operational Restrictions

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

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

d) Monitoring and/or Recordkeeping Requirements

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

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

- (2) The permittee shall maintain the following daily records for each EU:
 - a. the identification of each mold compound employed in the EU;
 - b. the weight of each mold compound employed in the EU;
 - c. the percent of available VOC/HAP, by weight, in each mold compound; and
 - d. the daily VOC/HAP emissions, calculated by the following equation, in lbs/day:

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

where:

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

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

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

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

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

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

- (3) The permittee shall conduct daily inspections of each EU and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in c)(1) and shall include the following information:
- a. whether the EU was in operation;
 - b. whether the permittee uncovered, unwrapped, or exposed more than one charge per mold cycle per compression/injection molding machine as specified in c)(1); and
 - c. information on the duration and cause of each deviation and the corrective action taken.

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

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

63.5915(a)	copy of compliance notification(s) and report(s)
63.5915(d)	certified statement of compliance with work practice requirements
63.5920(a) – (d)	record keeping format and retention requirements

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

e) Reporting Requirements

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

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

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

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

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emissions exceeded the lbs/day limit for each EU in b)(2)a, and the actual VOC emission for each such day of each such EU. The quarterly deviation reports shall be submitted in accordance with the reporting requirements as specified in section A of this permit.

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

- (4) The permittee must submit semiannual compliance reports:
- if there are no deviations from the work practice standard in c)(1), provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., the facility had uncovered, unwrapped or exposed only one charge per mold cycle per compression molding machine);
 - if there were deviations with any of the work practice standard in c)(1), provide the total operating time of each EU during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

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

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

f) **Testing Requirements**

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

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

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

a. **Emission Limitations:**

VOC/HAP emissions shall not exceed the following:

EU ID	Equipment Description	Lbs/day	TPY
P009	Thermoset Compression Mold Press No. 2	14.2	2.60
P010	Thermoset Compression Mold Press No. 5	14.2	2.60
P011	Thermoset Compression Mold Press No. 11	2.7	0.5
P012	Thermoset Compression Mold Press No. 14	14.2	2.60
P013	Thermoset Compression Mold Press No. 23	2.7	0.5
P014	Thermoset Compression Mold Press No. 38	40	7.30
P015	Thermoset Compression Mold Press No. 39	14.2	2.60

EU ID	Equipment Description	Lbs/day	TPY
P016	Thermoset Compression Mold Press No. 40	14.2	2.60
P017	Thermoset Compression Mold Press No. 41	14.2	2.60
P018	Thermoset Compression Mold Press No. 42	14.2	2.60
P019	Thermoset Compression Mold Press No. 43	14.2	2.60
P020	Thermoset Compression Mold Press No. 44	14.2	2.60
P021	Thermoset Compression Mold Press No. 45	40	7.30
P022	Thermoset Compression Mold Press No. 47	40	7.30
P023	Thermoset Compression Mold Press No. 48	14.2	2.60
P024	Thermoset Compression Mold Press No. 49	40	7.30
P025	Thermoset Compression Mold Press No. 50	40	7.30
P026	Thermoset Compression Mold Press No. 51	40	7.30
P027	Thermoset Compression Mold Press No. 52	40	7.30
P028	Thermoset Compression Mold Press No. 53	14.2	2.60
P029	Thermoset Compression Mold Press No. 54	14.2	2.60

Applicable Compliance Method:

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

The TPY emission limitation were developed by multiplying the short-term allowable VOC/HAP emission limitation, in lbs/day, by the maximum 365 days per year, and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

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

g) Miscellaneous Requirements

(1) None.