



10/28/2026

Mr. Matthew Narducci
Iten Industries, Inc., Plant 4
1401 Westminister Avenue
Ashtabula, OH 44004

Facility ID: 0204010405
Permit Number: P0140373
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](#). The permit can also be commented on and accessed electronically at: <https://ohioepa.commentinput.com>. Search by entering the permit # (P0140373) in the "Search Projects" search box and selecting "Review Document" or "Draft Permit." Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Written (paper) 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
8957 Canyon Falls Blvd.
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

Iten Industries, Inc., Plant 4
3500 North Ridge West
Ashtabula, OH 44004

ID#: P0140373
Date of Action: 10/28/2026
Permit Desc: Title V renewal for a reinforced composite plastic manufacturing facility.

The permit can be accessed electronically and comments may be submitted at: <https://ohioepa.commentinput.com> - Search by entering the permit P0140373 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:	0204010405
Facility Name:	ITEN INDUSTRIES, INC., PLANT 4
Facility Description:	Manufacturing Facility
Facility Address:	3500 NORTH RIDGE WEST Ashtabula, OH 44004
Permit #:	P0140373

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.: P0135300

Affected EUs: P048-P055

Discussion of changes from the previous Title V: These new EUs have been added to the Title V.

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.: N/A

Affected EUs:

Minor Modification Description:

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.: N/A

Affected EUs:

Significant Modification Description:

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.: N/A

Affected EUs:

Reopening for Cause for Description:

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

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.2. and B.13.			Identification of the applicable requirements of 40 CFR Part 63, Subpart WWWW.
B.3., B.4., B.5., B.6., B.7., B.8., B.9., B.10., B.11., B.12., B.13. and B.14.			Identification of the applicable requirements of OAC Rule 3745-21-25.

C. Emissions Unit Terms and Conditions

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

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
Section C.1: P010											
P010	The BAT requirements under OAC rule 3745-31-05(A)(3) do	OAC rule 3745-31-05(A)(3)(a)(ii)	Y	N	N	N	N	N	N	N	



Draft Title V Permit
 Iten Industries, Inc., Plant 4
Permit Number: P0140373
Facility ID: 0204010405
Statement of Basis

Emissions Unit Table

[illegible]

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	taking into account the voluntary restriction per OAC rule 3745-31-05(E).										
P010	The permittee shall operate the dust control system (e.g. WF#1) to control PE whenever this EU is in operation.	OAC rule 3745 -31-05(E)	N	Y	Y	Y	Y	N	N	N	<p>OR: Shall operate the dust control system (e.g. WF#1) to control PE whenever this EU is in operation.</p> <p>M and R: Maintain daily records that document any time periods when the dust control system was not in service when the EU was in operation</p> <p>Rp: Submit semiannual written reports that identify any daily record showing that the dust control system (e.g. (WF#1)) for this EU was not in service when the EU was in operation.</p>
P010	Visible PE from the stack serving this EU shall not	OAC rule 3745 -17-07(A)(1)	N	N	Y	Y	N	Y	N	N	<p>M and R: Perform weekly checks, and maintain a log noting the presence or absence. If VE are observed, the permittee shall also note the following in the operations log: a. the color of the emissions; b. whether the emissions are representative of normal operations; c. if the emissions are</p>

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	exceed 20% opacity as a 6-minute average, except as provided by the rule.										<p>not representative of normal operations, the cause of the abnormal emissions; d. the total duration of any VE incident; and e. any corrective actions taken to minimize or eliminate the VE. If VE are present, a VE incident has occurred. The observer does not have to document the exact start and end times for the VE incident under item d)(2)d above or continue the weekly check until the incident has ended. The observer may indicate that the VE incident was continuous during the observation period (or, if known, continuous during the operation of the EU). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the VE were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the EU continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal VE.</p> <p>Rp: Submit semiannual written reports that identify: all days during which any visible particulate emissions were observed from the stack serving this EU; and any corrective actions taken to minimize or eliminate the visible particulate emissions.</p> <p>ET: If required, compliance with the stack visible PE limitation shall be demonstrated through VE observations performed in accordance with</p>

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
											the methods and procedures specified in 40 CFR Part 60, Appendix A-4, Method 9.
P010	PE shall not exceed 0.551 lb./hr., the rate allowed by Table I to OAC rule 3745-17-11	OAC rule 3745 -17-11(B)(1)	N	N	N	N	N	Y	N	N	ET: Emissions calculation for hourly emissions and If required, compliance with the allowable particulate emission limitation shall be demonstrated in accordance with the following method(s): Methods 1 through 4 and Method 5 of 40 CFR Part 60, Appendices A1 through A3.
P010	VOC emissions shall not exceed the applicable VOC control requirements specified in OAC rule 3745-21-25(D) including the work practice	OAC rule 3745 -21-25	N	Y	Y	Y	Y	Y	N	N	<p>Full requirements are identified in the facility wide section of the permit terms and the emission units reference the facility wide section</p> <p>OR: Work practice standards of the following: a. use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 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 95 percent efficient control device are exempt from this requirement.</p>

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	standards in Tables 1										<p>c. keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.</p> <p>M and R: Compliance with the work practice standards in table 1 of this rule is demonstrated by performing the work practice required for the affected operation.; A certified statement that operations are in compliance with the applicable work practice standards specified in Table 1 of OAC rule 3745-21-25.</p> <p>Rp: Submit semiannual compliance reports</p> <p>ET: The permittee may calculate a VOC emissions factor based on the factors in Table 1 of 40 CFR Part 63, Subpart WWWW, or may use any VOC emissions factor approved by U.S. EPA, such as factors from AP-42, or VOC emissions test data from similar facilities.</p>
P010	Organic HAP emissions shall not exceed the applicable standards specified in 40	40 CFR Part 63, Subpart WWWW	N	Y	Y	Y	Y	Y	N	N	<p>Full requirements are identified in the facility wide section of the permit terms and the emission units reference the facility wide section</p> <p>OR: Work practice requirements of use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation; close any mixer vents when actual mixing is occurring, except that venting is</p>

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	CFR §63.5805 including complying with the work practice standard in Table 4 of 40 CFR 63 Subpart WWWW										<p>allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement; and keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.</p> <p>M and R: Compliance with the work practice standards in Table 4 to this subpart is demonstrated by performing the work practice required for the operation. Certified statement of compliance with work practice requirements.</p> <p>Rp: Submit semiannual reports and such other notifications and reports to the Ohio EPA, Northeast District Office as are required in Table 14 to 40 CFR Part 63, Subpart WWWW</p> <p>ET: The permittee may calculate a VOC emissions factor based on the factors in Table 1 of 40 CFR Part 63, Subpart WWWW, or may use any VOC emissions factor approved by U.S. EPA, such as factors from AP-42, or VOC emissions test data from similar facilities.</p>
P010	Table 15 to Subpart WWWW of 40	40 CFR §63.1 - §63.15									Applicable general provisions table identification.



Draft Title V Permit
 Iten Industries, Inc., Plant 4
Permit Number: P0140373
Facility ID: 0204010405
Statement of Basis

Emissions Unit Table

[illegible]

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	this air contaminant source since the controlled PTE is less than 10 TPY.										
P011	The emissions from this EU shall be vented to a baghouse at all times the EU is in operation. EUs P001 - P007, P011 and P012 share a common baghouse.	OAC rule 3745-31-05(E)	N	N	Y	Y	Y	N	N	N	<p>M and R: acceptable range established for the pressure drop across the baghouse is between 1 to 5 inches of water; The permittee shall record the pressure drop across the baghouse on weekly basis. Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation and maintain records for each investigation;</p> <p>Rp: Submit quarterly deviation reports that identify: a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range; b. any period of time (start time and date, and end time and date) when the EU(s) was/were in operation and the process emissions were not vented to the baghouse; c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted; d. each incident of deviation described in "a" where prompt corrective action, that would bring the</p>

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
											pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
P011	Visible PE from the stack(s) serving this EU shall not exceed 20% opacity as a 6-minute average each, except as provided by the rule.	OAC rule 3745-17-07(A)(1)	N	N	Y	Y	Y	Y	N	N	M and R: Perform weekly checks, and maintain a log noting the presence or absence. If VE are observed, the permittee shall also note the following in the operations log: a. the color of the emissions; b. whether the emissions are representative of normal operations; c. if the emissions are not representative of normal operations, the cause of the abnormal emissions; d. the total duration of any VE incident; and e. any corrective actions taken to minimize or eliminate the VE. If VE are present, a VE incident has occurred. The observer does not have to document the exact start and end times for the VE incident under item d)(2)d above or continue the weekly check until the incident has ended. The observer may indicate that the VE incident was continuous during the observation period (or, if known, continuous during the operation of the EU). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the VE were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the EU continued to operate under

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
											<p>normal conditions, or specify the corrective actions that were taken to eliminate abnormal VE.</p> <p>Rp: The permittee shall submit semiannual written reports that identify: all days during which any visible PE were observed from the stack serving this EU; and any corrective actions taken to minimize or eliminate the visible PE.</p> <p>ET: If required, compliance with the stack visible PE limitation shall be demonstrated through VE observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A-4, Method 9.</p>
P011	PE shall not exceed 0.92 lb./hr., the rate allowed by Table 1 to OAC rule 3745-17-11.	OAC rule 3745-17-11(B)(1)	N	N	y	Y	N	Y	Y	Y	<p>M and R: The permittee shall record the pressure drop across the baghouse on weekly basis. Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation and maintain records for each investigation; shall maintain daily records that document any time periods when the dust control system was not in service when the EU was in operation.</p>



Draft Title V Permit
 Iten Industries, Inc., Plant 4
Permit Number: P0140373
Facility ID: 0204010405
Statement of Basis

Emissions Unit Table

[illegible]

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	under the CAA.										
P013	<p>VOC emissions shall not exceed the applicable VOC control requirements specified in OAC rule 3745-21-25(D).</p> <p>The permittee shall meet the applicable work practice standards in Table 1 of OAC rule 3745-21-25 for affected operations</p>	OAC rule 3745-21-25	N	N	Y	Y	Y	N	N	N	<p>Full requirements are identified in the facility wide section of the permit terms and the emission units reference the facility wide section</p> <p>Work Practice Requirements: For a cleaning operation (cleaning of equipment used in reinforced plastic composites manufacture), the permittee must not use cleaning solvents (cleaners) that have a VOC content greater than 0.42 pound VOC per gallon, except cleaners used in closed systems and used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. b. "Cleaning" means removal of composite materials, such as cured and uncured resin from equipment, finished surfaces, floors, hands of employees, or any other surfaces. c. For a VOC-containing materials storage operation, the permittee shall keep containers that store VOC-containing materials closed or covered except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety. d. The following operations and materials are specifically excluded from any requirements in OAC rule 3745-21-25: i. application of mold sealing and release agents; ii. mold stripping and cleaning; and iii. repair of reinforced plastic composites</p>

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	See additional comments for work practice requirements										<p>parts that the facility did not manufacture, including non-routine manufacturing of parts.</p> <p>M and R: Compliance with the work practice standards in table 1 of this rule is demonstrated by performing the work practice required for the affected operation.; A certified statement that operations are in compliance with the applicable work practice standards specified in Table 1 of OAC rule 3745-21-25.</p> <p>Rp: Submit semiannual compliance reports</p> <p>ET: The permittee may calculate a VOC emissions factor based on the factors in Table 1 of 40 CFR Part 63, Subpart WWWW, or may use any VOC emissions factor approved by U.S. EPA, such as factors from AP-42, or VOC emissions test data from similar facilities.</p>
P013	Organic HAP emissions shall meet the applicable standards specified in 40 CFR §63.5805	40 CFR Part 63, Subpart WWWW									<p>Full requirements are identified in the facility wide section of the permit terms and the emission units reference the facility wide section.</p> <p>Work Practice: not use cleaning solvents (cleaners) that have a VOC content greater than 0.42 pound VOC per gallon, except cleaners used in closed systems and used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin; and keep containers that store VOC-containing materials</p>

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	including the work practice standard in Table 4 of 40 CFR 63 Subpart WWWW.										<p>closed or covered except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety.</p> <p>M and R: Compliance with the work practice standards in Table 4 to this subpart is demonstrated by performing the work practice required for the operation. Certified statement of compliance with work practice requirements.</p> <p>Rp: Submit semiannual reports and such other notifications and reports to the Ohio EPA, Northeast District Office as are required in Table 14 to 40 CFR Part 63, Subpart WWWW</p> <p>ET: The permittee may calculate a VOC emissions factor based on the factors in Table 1 of 40 CFR Part 63, Subpart WWWW, or may use any VOC emissions factor approved by U.S. EPA, such as factors from AP-42, or VOC emissions test data from similar facilities.</p>
P013	Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability	40 CFR §63.1 – §63.15									Applicable general provisions table identification.

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	of General Provisions (Subpart A) to Subpart WWW of Part 63 shows which parts of the General Provisions in 40 CFR 63.1 – 63.15 apply.										
Section C.4: P020, TMP Press 402400											
P020	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air	OAC rule 3745 -31-05 (A)(3) (a)(ii)	Y	N	N	N	N	N	N	N	

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	contaminant source since the uncontrolled PTE is less than 10 TPY.										
P020	VOC emissions shall not exceed the applicable VOC control requirements specified in OAC rule 3745-21-25(D) including the work practice standards in Tables 1. See work practice	OAC rule 3745 -21-25	N	N	Y	Y	Y	Y	N	N	<p>Full requirements are identified in the facility wide section of the permit terms and the emission units reference the facility wide section.</p> <p>Work practice requirements: a.Uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.</p> <p>M and R: Compliance with the work practice standards in table 1 of this rule is demonstrated by performing the work practice required for the affected operation.; A certified statement that operations are in</p>

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	requirements in comments.										<p>compliance with the applicable work practice standards specified in Table 1 of OAC rule 3745-21-25.</p> <p>Rp: Submit semiannual compliance reports</p> <p>ET: The permittee may calculate a VOC emissions factor based on the factors in Table 1 of 40 CFR Part 63, Subpart WWWW, or may use any VOC emissions factor approved by U.S. EPA, such as factors from AP-42, or VOC emissions test data from similar facilities.</p>
P020	Organic HAP emissions shall not exceed the applicable standards specified in 40 CFR §63.5805 including the work practice standards in Tables 4 of	40 CFR Part 63, Subpart WWWW	N	N	Y	Y	Y	Y	N	N	<p>Full requirements are identified in the facility wide section of the permit terms and the emission units reference the facility wide section.</p> <p>Work practice requirements: uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.</p> <p>M and R: Compliance with the work practice standards in Table 4 to this subpart is demonstrated by performing the work practice required for the</p>

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	Subpart WWWW. See comments section.										<p>operation. Certified statement of compliance with work practice requirements.</p> <p>Rp: Submit semiannual reports and such other notifications and reports to the Ohio EPA, Northeast District Office as are required in Table 14 to 40 CFR Part 63, Subpart WWWW</p> <p>ET: The permittee may calculate a VOC emissions factor based on the factors in Table 1 of 40 CFR Part 63, Subpart WWWW, or may use any VOC emissions factor approved by U.S. EPA, such as factors from AP-42, or VOC emissions test data from similar facilities.</p>
P020	Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63 shows	40 CFR §63.1 - §63.15									Applicable general provisions table identification.

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	which parts of the General Provisions in 40 CFR 63.1 – 63.15 apply.										
Section C.5: EU Group - Injection Mold Presses: P048, P049, P050, P051, P052, P053, P054 and P055											
P048, P049, P050, P051, P052, P053, P054 and P055	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled	OAC rule 3745 -31-05 (A)(3) (a)(ii)	Y	N	N	N	N	N	N	N	

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	PTE is less than 10 TPY.										
P048, P049, P050, P051, P052, P053, P054 and P055	VOC emissions shall not exceed the applicable VOC control requirements specified in OAC rule 3745-21-25(D) including the work practice standards in Tables 1. See work practice requirements in comments.	OAC rule 3745 -21-25	N	N	Y	Y	Y	Y	N	N	<p>Full requirements are identified in the facility wide section of the permit terms and the emission units reference the facility wide section.</p> <p>Work practice requirements: a.Uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.</p> <p>M and R: Compliance with the work practice standards in table 1 of this rule is demonstrated by performing the work practice required for the affected operation.; A certified statement that operations are in compliance with the applicable work practice standards specified in Table 1of OAC rule 3745-21-25.</p> <p>Rp: Submit semiannual compliance reports</p>

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
											<p>ET: The permittee may calculate a VOC emissions factor based on the factors in Table 1 of 40 CFR Part 63, Subpart WWWW, or may use any VOC emissions factor approved by U.S. EPA, such as factors from AP-42, or VOC emissions test data from similar facilities.</p>
P048, P049, P050, P051, P052, P053, P054 and P055	Organic HAP emissions shall not exceed the applicable standards specified in 40 CFR §63.5805 including the work practice standards in Tables 4 of Subpart WWWW.	40 CFR Part 63, Subpart WWWW	N	N	Y	Y	Y	Y	N	N	<p>Full requirements are identified in the facility wide section of the permit terms and the emission units reference the facility wide section.</p> <p>Work practice requirements: uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.</p> <p>M and R: Compliance with the work practice standards in Table 4 to this subpart is demonstrated by performing the work practice required for the operation. Certified statement of compliance with work practice requirements.</p>

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	See comments section.										<p>Rp: Submit semiannual reports and such other notifications and reports to the Ohio EPA, Northeast District Office as are required in Table 14 to 40 CFR Part 63, Subpart WWWW</p> <p>ET: The permittee may calculate a VOC emissions factor based on the factors in Table 1 of 40 CFR Part 63, Subpart WWWW, or may use any VOC emissions factor approved by U.S. EPA, such as factors from AP-42, or VOC emissions test data from similar facilities.</p>
P048, P049, P050, P051, P052, P053, P054 and P055	Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63 shows which parts of the General Provisions in	40 CFR §63.1 - §63.15									Applicable general provisions table identification.

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM emissions from this air contaminant source since the controlled PTE is less than 10 TPY.										
P009, P014 and P015	The permittee shall operate the dust control system (e.g. WF#1) to control PE whenever this	OAC rule 3745 -31-05(E)	N	Y	Y	Y	Y	N	N	N	<p>OR: Shall operate the dust control system (e.g. WF#1) to control PE whenever this EU is in operation.</p> <p>M and R: Maintain daily records that document any time periods when the dust control system was not in service when the EU was in operation</p>

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	EU is in operation.										Rp: Submit semiannual written reports that identify any daily record showing that the dust control system (e.g. (WF#1)) for this EU was not in service when the EU was in operation.
P009, P014 and P015	Visible PE from the stack(s) serving these EUs shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.	OAC rule 3745 -17-07(A)(1)	N	N	Y	Y	N	Y	N	N	M and R: Perform weekly checks, and maintain a log noting the presence or absence. If VE are observed, the permittee shall also note the following in the operations log: a. the color of the emissions; b. whether the emissions are representative of normal operations; c. if the emissions are not representative of normal operations, the cause of the abnormal emissions; d. the total duration of any VE incident; and e. any corrective actions taken to minimize or eliminate the VE. If VE are present, a VE incident has occurred. The observer does not have to document the exact start and end times for the VE incident under item d)(2)d above or continue the weekly check until the incident has ended. The observer may indicate that the VE incident was continuous during the observation period (or, if known, continuous during the operation of the EU). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the VE were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the EU continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal VE.

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
											<p>Rp: Submit semiannual written reports that identify: all days during which any visible particulate emissions were observed from the stack serving this EU; and any corrective actions taken to minimize or eliminate the visible particulate emissions.</p> <p>ET: If required, compliance with the stack visible PE limitation shall be demonstrated through VE observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A-4, Method 9.</p>
P009, P014 and P015	PE from each EU shall not exceed 2.58 lbs./hr., the rate allowed by Table 1 to OAC rule 3745-17-11.	OAC rule 3745 -17-11(B)(1)	N	N	N	N	N	Y	N	N	<p>ET: Emissions calculation for hourly emissions and If required, compliance with the allowable particulate emission limitation shall be demonstrated in accordance with the following method(s): Methods 1 through 4 and Method 5 of 40 CFR Part 60, Appendices A1 through A3.</p>

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
P009, P014 and P015	VOC emissions shall not exceed the applicable VOC control requirements specified in OAC rule 3745-21-25(D) including the work practice standards in Tables 1.	OAC rule 3745-21-25	N	Y	Y	Y	Y	Y	N	N	<p>Full requirements are identified in the facility wide section of the permit terms and the emission units reference the facility wide section</p> <p>OR: Work practice standards of the following: a. use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 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 95 percent efficient control device are exempt from this requirement. c. keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.</p> <p>M and R: Compliance with the work practice standards in table 1 of this rule is demonstrated by performing the work practice required for the affected operation.; A certified statement that operations are in compliance with the applicable work practice standards specified in Table 1 of OAC rule 3745-21-25.</p> <p>Rp: Submit semiannual compliance reports</p> <p>ET: The permittee may calculate a VOC emissions factor based on the factors in Table 1 of 40 CFR Part 63, Subpart WWWW, or may use any VOC</p>

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
											emissions factor approved by U.S. EPA, such as factors from AP-42, or VOC emissions test data from similar facilities.
P009, P014 and P015	Organic HAP emissions shall not exceed the applicable standards specified in 40 CFR §63.5805.	40 CFR Part 63, Subpart WWWW	N	Y	Y	Y	Y	Y	N	N	<p>Full requirements are identified in the facility wide section of the permit terms and the emission units reference the facility wide section</p> <p>OR: Work practice requirements of use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation; 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 95 percent efficient control device are exempt from this requirement; and keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.</p> <p>M and R: Compliance with the work practice standards in Table 4 to this subpart is demonstrated by performing the work practice required for the operation. Certified statement of compliance with work practice requirements.</p>

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
											<p>Rp: Submit semiannual reports and such other notifications and reports to the Ohio EPA, Northeast District Office as are required in Table 14 to 40 CFR Part 63, Subpart WWWW</p> <p>ET: The permittee may calculate a VOC emissions factor based on the factors in Table 1 of 40 CFR Part 63, Subpart WWWW, or may use any VOC emissions factor approved by U.S. EPA, such as factors from AP-42, or VOC emissions test data from similar facilities.</p>
P009, P014 and P015	Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63 shows which parts of the General Provisions in	40 CFR §63.1 - §63.15									Applicable general provisions table identification.

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	40 CFR 63.1 – 63.15 apply.										
Section C.7: EU Group - Liquid Composite Molding: P016, P017 and P018											
P016, P017 and P018	For the VOC emissions, the requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW and the requirements of OAC rule 3745-21-25.	OAC rule 3745-31-05(A)(3)	Y	N	N	N	N	N	N	N	

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
P016, P017 and P018	VOC emissions shall not exceed the applicable VOC control requirements specified in OAC rule 3745-21-25(D) including the work practice standards in Tables 1.	OAC rule 3745-21-25	N	N	Y	Y	Y	Y	N	N	<p>Full requirements are identified in the facility wide section of the permit terms and the emission units reference the facility wide section.</p> <p>Work practice requirements: a.Uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.</p> <p>M and R: Compliance with the work practice standards in table 1 of this rule is demonstrated by performing the work practice required for the affected operation.; A certified statement that operations are in compliance with the applicable work practice standards specified in Table 1of OAC rule 3745-21-25.</p> <p>Rp: Submit semiannual compliance reports</p> <p>ET: The permittee may calculate a VOC emissions factor based on the factors in Table 1 of 40 CFR Part 63, Subpart WWWW, or may use any VOC</p>

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
											emissions factor approved by U.S. EPA, such as factors from AP-42, or VOC emissions test data from similar facilities.
P016, P017 and P018	Organic HAP emissions shall not exceed the applicable standards specified in 40 CFR §63.5805 including the work practice standards in Tables 4 of Subpart WWWW.	40 CFR Part 63, Subpart WWWW	N	N	Y	Y	Y	Y	N	N	<p>Full requirements are identified in the facility wide section of the permit terms and the emission units reference the facility wide section.</p> <p>Work practice requirements: uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.</p> <p>M and R: Compliance with the work practice standards in Table 4 to this subpart is demonstrated by performing the work practice required for the operation. Certified statement of compliance with work practice requirements.</p> <p>Rp: Submit semiannual reports and such other notifications and reports to the Ohio EPA, Northeast District Office as are required in Table 14 to 40 CFR Part 63, Subpart WWWW</p>

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
											ET: The permittee may calculate a VOC emissions factor based on the factors in Table 1 of 40 CFR Part 63, Subpart WWWW, or may use any VOC emissions factor approved by U.S. EPA, such as factors from AP-42, or VOC emissions test data from similar facilities.
P016, P017 and P018	Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63 shows which parts of the General Provisions in 40 CFR 63.1 – 63.15 apply.	40 CFR §63.1 - §63.15									Applicable general provisions table identification.

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
Section C.8: EU Group - P001, P002, P003, P004, P005, P006, P007, P008, and P012.											
P001, P002, P003, P004, P005, P006, P007, P008, and P012.	See comments section	OAC rule 3745-31-05(A)(3)(a)(ii)									<p><u>For EUs P001, P002, P003, P004, P005, P006, and P007:</u></p> <p>The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC, emissions from this air contaminant source since the uncontrolled PTE is less than 10 TPY.</p> <p>The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from this air contaminant source since the controlled PTE is less than 10 TPY taking into account the voluntary restriction from OAC rule 3745-31-05(E).</p> <p><u>For EU P012:</u></p> <p>The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE emissions from this air contaminant source since the controlled PTE is less than 10 TPY.</p> <p>For the VOC emissions from EU P012, the requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW and compliance with the requirements of OAC rule 3745-21-25.</p>

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
P001, P002, P003, P004, P005, P006, P007, P008, and P012.	The emissions from the EUs listed above shall be vented to the baghouse when one or more of the EUs are in operation. EUs P001 - P007, P011 and P012 share a common baghouse.	OAC rule 3745-31-05(E)	N	N	Y	Y	Y	N	N	N	<p>M and R: acceptable range established for the pressure drop across the baghouse is between 1 to 5 inches of water; The permittee shall record the pressure drop across the baghouse on weekly basis. Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation and maintain records for each investigation;</p> <p>Rp: Submit quarterly deviation reports that identify: a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range; b. any period of time (start time and date, and end time and date) when the EU(s) was/were in operation and the process emissions were not vented to the baghouse; c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted; d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.</p>

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
P001, P002, P003, P004, P005, P006, P007, P008, and P012.	Visible PE from the stack(s) serving these EUs shall not exceed 20% opacity as a 6-minute average each, except as provided by the rule.	OAC rule 3745-17-07(A)(1)	N	N	Y	Y	Y	Y	N	N	<p>M and R: Perform weekly checks, and maintain a log noting the presence or absence. If VE are observed, the permittee shall also note the following in the operations log: a. the color of the emissions; b. whether the emissions are representative of normal operations; c. if the emissions are not representative of normal operations, the cause of the abnormal emissions; d. the total duration of any VE incident; and e. any corrective actions taken to minimize or eliminate the VE. If VE are present, a VE incident has occurred. The observer does not have to document the exact start and end times for the VE incident under item d)(2)d above or continue the weekly check until the incident has ended. The observer may indicate that the VE incident was continuous during the observation period (or, if known, continuous during the operation of the EU). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the VE were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the EU continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal VE.</p> <p>Rp: The permittee shall submit semiannual written reports that identify: all days during which any visible PE were observed from the stack serving this EU; and any corrective actions taken to minimize or eliminate the visible PE.</p>

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
											<p>ET: If required, compliance with the stack visible PE limitation shall be demonstrated through VE observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A-4, Method 9.</p>
P001, P002, P003, P004, P005, P006, P007, P008, and P012.	PE shall not exceed the following allowable emission rates allowed by Table 1 to OAC rule 3745-17-11: 2.09 lbs./hr. from P001-P006 and P008 each; 0.551 lb./hr. from P007; and 2.66	OAC rule 3745-17-11(B)(1)	N	N	y	Y	N	Y	Y	Y	<p>M and R: The permittee shall record the pressure drop across the baghouse on weekly basis. Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation and maintain records for each investigation; shall maintain daily records that document any time periods when the dust control system was not in service when the EU was in operation.</p> <p>ET: Emissions calculation for hourly emissions and If required, compliance with the allowable particulate emission limitation shall be demonstrated in accordance with the following method(s): Methods 1 through 4 and Method 5 of 40 CFR Part 60, Appendices A1 through A3.</p>

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	lbs./hr. from P012.										
P001, P002, P003, P004, P005, P006, P007, P008, and P012.	VOC emissions shall not exceed the applicable VOC control requirements specified in OAC rule 3745-21-25(D) including the work practice standards in Tables 1.	OAC rule 3745-21-25	N	N	Y	Y	Y	Y	N	N	<p>Full requirements are identified in the facility wide section of the permit terms and the emission units reference the facility wide section.</p> <p>Work practice requirements: Pultrusion operation manufacturing parts that meet the following criteria: one thousand or more reinforcements or the glass equivalent of one thousand ends of one hundred thirteen yield roving or more; and have a cross-sectional area of sixty square inches or more that is not subject to the ninety-five per cent VOC emissions reduction requirement. a. not allow vents from the building ventilation system, or local or portable fans to blow directly on or across the wet-out area(s); b. not permit point suction of ambient air in the wet-out area(s) unless that air is directed to a control device; c. use devices such as deflectors, baffles, and curtains when practical to reduce air flow velocity across the wet-out area(s); d. direct any compressed air exhausts away from resin and wet-out area(s); e. convey resin collected from drip-off pans or other devices to reservoirs, tanks, or sumps via covered troughs, pipes, or other covered conveyance that shields the resin from the ambient air; f. cover all reservoirs, tanks, sumps, or HAP-containing materials storage vessels except when they are being charged or filled;</p>

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
											<p>and g. cover or shield from ambient air resin delivery systems to the wet-out area(s) from reservoirs, tanks, or sumps where practical.</p> <p>Emissions limitation: reduce total VOC emissions by at least 60 weight percent using one or more of the options in paragraphs (I)(1) to (I)(5) of OAC rule 3745-21-25 to meet the sixty weight per cent VOC emissions limit in table 2 to OAC rule 3745-21-25 including any revisions or amendments.</p> <p>M and R: Monitoring and recordkeeping requirements of the following section of the rule (O)(1)(a)(i), (O)(1)(a)(ii), (O)(1)(a)(iv), (O)(1)(b), (O)(1)(c), (O)(2)(b), (O)(2)(d), (P)(1)(a), (P)(1)(c), (P)(1)(e), and (P)(4).</p> <p>Rp: Reporting requirements of the following sections of this rule: (Q)(1) and (2) (Q)(3)(a) through (h), (Q)(3)(h), (Q)(4) and (Q)(5).</p> <p>ET: The permittee may calculate a VOC emissions factor based on the factors in Table 1 of 40 CFR Part 63, Subpart WWWW, or may use any VOC emissions factor approved by U.S. EPA, such as factors from AP-42, or VOC emissions test data from similar facilities.</p>
P001, P002,	Organic HAP emissions	40 CFR Part 63,	N	N	Y	Y	Y	Y	N	N	Full requirements are identified in the facility wide section of the permit terms and the emission units reference the facility wide section.

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
P003, P004, P005, P006, P007, P008, and P012.	shall not exceed the applicable standards specified in 40 CFR §63.5805.	Subpart WWWW									<p>Work practice requirements: For new or existing pultrusion operation manufacturing parts that meet the following criteria: 1,000 or more reinforcements or the glass equivalent of 1,000 ends of 113 yield roving or more; and have a cross sectional area of 60 square inches or more that is not subject to the 95 percent organic HAP emission reduction requirement.i. not allow vents from the building ventilation system, or local or portable fans to blow directly on or across the wet-out area(s); ii. not permit point suction of ambient air in the wet-out area(s) unless that air is directed to a control device; iii. use devices such as deflectors, baffles, and curtains when practical to reduce air flow velocity across the wet-out area(s); iv. direct any compressed air exhausts away from resin and wet-out area(s); v. convey resin collected from drip-off pans or other devices to reservoirs, tanks, or sumps via covered troughs, pipes, or other covered conveyance that shields the resin from the ambient air; vi. cover all reservoirs, tanks, sumps, or HAP-containing materials storage vessels except when they are being charged or filled; and vii. cover or shield from ambient air resin delivery systems to the wet-out area(s) from reservoirs, tanks, or sumps where practical.</p> <p>Emissions Limit: reduce total organic HAP emissions by at least 60 weight percent. use one or more of the options in paragraphs (a) through (e) of 40 CFR §63.5830 to meet the 60 weight percent organic HAP emissions limit in Table 3 to 40 CFR Part 63, Subpart WWWW, as required in 40 CFR §63.5805.</p>

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
											<p>M and R: Monitoring and recordkeeping requirements of the following section of the rule: §63.5895(c), §63.5895(e), §63.5915(a) and (a)(1), §63.5915(c), §63.5915(d), §63.5920(a) through (d) §63.5900(a)(1), §63.5900(a)(2), §63.5900(a)(4), §63.5900(b), and §63.5900(c).</p> <p>Rp: Reporting requirements of the following sections of this rule: §63.5910(a) and (b) and Table 14, §63.5910(c) through (i) and Table 14, §63.5910(d); and §63.5900(a)(2) and (3), §63.5910(f), §63.5910(g), and §63.5910(i).</p> <p>ET: The permittee may calculate a VOC emissions factor based on the factors in Table 1 of 40 CFR Part 63, Subpart WWWW, or may use any VOC emissions factor approved by U.S. EPA, such as factors from AP-42, or VOC emissions test data from similar facilities.</p>
P001, P002, P003, P004, P005, P006, P007,	Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions	40 CFR §63.1 - §63.15									Applicable general provisions table identification.



Draft Title V Permit
Iten Industries, Inc., Plant 4
Permit Number: P0140373
Facility ID: 0204010405
Statement of Basis

Emissions Unit Table

[illegible]



DRAFT

Division of Air Pollution Control
Title V Permit
for
ITEN INDUSTRIES, INC., PLANT 4

Facility ID:	0204010405
Permit Number:	P0140373
Permit Type:	Renewal
Issued:	10/28/2026
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
ITEN INDUSTRIES, INC., PLANT 4

Table of Contents

Authorization.....	53
List of Commonly Used Abbreviations	54
A. Standard Terms and Conditions.....	55
B. Facility Wide Terms and Conditions	69
C. Emissions Unit Terms and Conditions.....	84
1. P010.....	85
2. P011.....	92
3. P013.....	99
4. P020, TMP Press 402400	104
5. EU Group – Injection Mold Presses: P048, P049, P050, P051, P052, P053, P054 and P055	108
6. EU Group – Large Mixers: P009, P014 and P015	113
7. EU Group – Liquid Composite Molding: P016, P017 and P018.....	121
8. EU Group – Pultrusion Lines: P001, P002, P003, P004, P005, P006, P007, P008 and P012	126

Authorization

Facility ID:	0204010405
Facility Description:	Manufacturing Facility
Application Number(s):	A0081616
Permit Number:	P0140373
Permit Description:	Title V renewal for a reinforced composite plastic 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:	P0129318

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

Iten Industries, Inc., Plant 4
3500 North Ridge West
Ashtabula, OH 44004

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

Ohio EPA DAPC, Northeast District Office
8957 Canyon Falls Blvd.
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.

Applicable Rules

2. The following EU(s) contained in this permit are subject to 40 CFR Part 63, Subpart WWWW, National Emission Standards for HAPs for Reinforced Plastic Composites Production:

EU ID	Operations, Property and/or Equipment Description
P001	Pultrusion line no. 1 for composite plastics production with a cut-off saw and a baghouse (DC #1) to control particulate emissions.
P002	Pultrusion line no. 2 for composite plastics production with a cut-off saw and a baghouse (DC #1) to control particulate emissions.
P003	Pultrusion line no. 3 for composite plastics production with a cut-off saw and a baghouse (DC #1) to control particulate emissions.
P004	Pultrusion line no. 4 for composite plastics production with a cut-off saw and a baghouse (DC #1) to control particulate emissions.
P005	Pultrusion line no. 5 for composite plastics production with a cut-off saw and a baghouse (DC #1) to control particulate emissions.
P006	Pultrusion line no. 6 for composite plastics production with a cut-off saw and a baghouse (DC #1) to control particulate emissions.
P007	Pultrusion line no. 7 for composite plastics production with a cut-off saw and a baghouse (DC #1) to control particulate emissions.
P008	Pultrusion line no. 8 for composite plastics production with a cut-off saw and a baghouse (DC #1) to control particulate emissions.
P009	Mixer no. 1 for polyester resin-styrene mixtures with a passive wall filter (WF#1) to control particulate emissions.
P010	50 lb. Mixer for polyester resin-styrene and epoxy resin mixtures with a passive wall filter (WF#1) to control particulate emissions.
P011	Vertical saw with a baghouse (DC #1) to control particulate emissions.
P012	Sheet pultrusion line for composite plastics production with a cut-off saw and a baghouse (DC #1) to control particulate emissions.
P013	Facility-wide cleanup
P014	Mixer no. 2 for polyester resin-styrene mixtures with a passive wall filter (WF#1) to control particulate emissions.

P015	Mixer no. 3 for polyester resin-styrene mixtures with a passive wall filter (WF#1) to control particulate emissions.
P016	Compression mold machine A using liquid compound for composite plastics production.
P017	Compression mold machine B using liquid compound for composite plastics production.
P018	Compression mold machine C using liquid compound for composite plastics production.
P020	Compression mold press 402400 using thermoplastic resin for composite plastics production.
P048	Injection Press 1
P049	Injection Press 2
P050	Injection Press 3
P051	Injection Press 4
P052	Injection Press 5
P053	Injection Press 6
P054	Injection Press 7
P055	Injection Press 8
None	Containers storing HAP-containing materials associated with reinforced plastic composites production.
T001	6000-gallon storage tank no. 1 for styrene-polyester resin.
T002	6000-gallon storage tank no. 2 for styrene-polyester resin.
T003	6000-gallon storage tank no. 3 for styrene-polyester resin.
T004	6000-gallon storage tank no. 4 for styrene-polyester resin.
T005	6000-gallon storage tank no. 5 for styrene-polyester resin.
T006	6000-gallon storage tank no. 6 for styrene-polyester resin.
T007	6000-gallon storage tank no. 7 for styrene-polyester resin.
T008	6000-gallon storage tank no. 8 for styrene-polyester resin.

The complete MACT requirements, including the MACT General Provisions may be accessed via the Internet from the e-CFR website: <http://ecfr.gov> or by contacting the Ohio EPA NEDO.

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

- The following EU(s) are subject to OAC rule 3745-21-25, Control of VOC emissions from reinforced plastic composites production operations: P001-P010, P012-P018, P020, P048-P055, T001-T008 and containers storing VOC-containing materials associated with reinforced plastic composites production.

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

Facility Classification and Compliance Dates

4. In accordance with OAC rule 3745-21-25(F)(1), this facility is a new facility since it includes one or more of the operations specified in paragraph (F)(1) of OAC rule 3745-21-25 and these operations have a startup on or after December 14, 2009. As required in OAC rule 3745-21-25 the permittee shall comply with the applicable requirements of this rule by no later than the following dates:
- a) For any affected operation for which installation commenced on or after December 14, 2009, the compliance date of the affected operation is the date of initial startup of the affected operation.
 - b) If the reinforced plastic composites production 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, and the facility subsequently increases VOC emissions to meet or exceed the threshold of one hundred tons of VOC per year from the combination of such operations, the compliance date of any affected operation pertaining to a new VOC emission requirement is two years from the date that the semiannual compliance report indicates the facility meets or exceeds the threshold of one hundred tons of VOC per year.

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

Applicable Standards for Organic HAP Emissions and VOC Control Requirements

5. The permittee shall comply with the applicable VOC control requirements required under OAC rule 3745-21-25 including but not limited to the sections listed in the table of applicable VOC control requirements including any revisions or amendments:

VOC Control Requirements	
OAC rule 3745-21-25 for VOC Emissions	Applicable Emissions Limitations/Control Measures
(D)(2)	A facility's VOC emissions threshold shall be calculated in accordance with paragraph (F) of this rule.
(D)(1)	The owner or operator of the reinforced plastic composites production facility shall meet the work practice standards in table 1 of this rule for affected operations.
(D)(2)	If the reinforced plastic composites production 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, the owner or operator shall meet the VOC emissions limits in table 2 of this rule.
(D)(3)	VOC emission reduction and alternative VOC emission limits for a facility that emits 100 tpy of VOC or more from specified operations.

VOC Control Requirements	
OAC rule 3745-21-25 for VOC Emissions	Applicable Emissions Limitations/Control Measures
(D)(4)	VOC emission reduction exemption for large parts production
(D)(5)	No exemption to VOC emission reduction or alternative VOC limits in Table 3 to this rule once the 100 tpy threshold is exceeded
(D)(6)	Applicability of VOC emission reduction or alternative VOC limits in Table 3 to this rule once the 100 tpy threshold is exceeded
(D)(7)	Specified repair operations are subject to the VOC emissions limits in table 2 to this rule and the work practice standards in table 1 to this rule.
(D)(10)	If an add-on control device is used to comply with this rule, all requirements contained in 40 CFR part 63, subpart SS must be met.
(D)(11)	Requirements for alternative requirements.

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

Work Practice Standards

6. The permittee shall comply with the applicable work practice requirements required under Table 1 to OAC rule 3745-21-25, including item nos. 1 through 3, 5 and 6, but not limited to these items including any revisions or amendments:

Table 1 to OAC rule 3745-21-25 - Work Practice Standards	
For...	The permittee must ...
1. a new or existing closed molding operation using compression/injection molding	uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.
2. a new or existing cleaning operation (cleaning of equipment used in reinforced plastic composites manufacture)	not use cleaning solvents (cleaners) that have a VOC content greater than 0.42 pound VOC per gallon, except cleaners used in closed systems and used to clean cured resin from application

Table 1 to OAC rule 3745-21-25 - Work Practice Standards

For...	The permittee must ...
	equipment. Application equipment includes any equipment that directly contacts resin.
3. VOC-containing materials storage operation	keep containers that store VOC-containing materials closed or covered except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety.
4. an existing or new SMC manufacturing operation	close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open.
5. SMC manufacturing operation	use a nylon containing film to enclose SMC.
6. all mixing or BMC manufacturing operations ¹	<p>a. use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.</p> <p>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 95 percent efficient control device are exempt from this requirement.</p> <p>c. keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.</p>
7. Pultrusion operation manufacturing parts that meet the following criteria: one thousand or more reinforcements or the glass equivalent of one thousand ends of one hundred thirteen yield roving or more; and have a cross-sectional area of sixty square inches or more that is not subject to the ninety-five percent VOC emissions reduction requirement.	<p>a. not allow vents from the building ventilation system, or local or portable fans to blow directly on or across the wet-out area(s);</p> <p>b. not permit point suction of ambient air in the wet-out area(s) unless that air is directed to a control device;</p> <p>c. use devices such as deflectors, baffles, and curtains when practical to reduce air flow velocity across the wet-out area(s);</p> <p>d. direct any compressed air exhausts away from resin and wet-out area(s);</p> <p>e. convey resin collected from drip-off pans or other devices to reservoirs, tanks, or sumps via covered troughs, pipes, or other covered conveyance that shields the resin from the ambient air;</p> <p>f. cover all reservoirs, tanks, sumps, or HAP-containing materials</p>

Table 1 to OAC rule 3745-21-25 - Work Practice Standards

For...	The permittee must ...
	storage vessels except when they are being charged or filled; and g. cover or shield from ambient air resin delivery systems to the wet-out area(s) from reservoirs, tanks, or sumps where practical.

¹Containers of five (5) gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of five hundred (500) square inches or less may be open while active mixing is taking place.

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

Emission Limits for Specific Open Molding, Centrifugal Casting, Pultrusion and Continuous Lamination/Casting Operations

7. The permittee must meet the applicable emission limits, specified by the type of operation in the following table, including item no. 9, but not limited to this item(s) including any revisions or amendments:

Table 2 to OAC rule 3745-21-25: VOC Emissions limits for specific open molding, centrifugal casting, pultrusion and continuous lamination/casting operations at facilities with VOC emissions less than the threshold of one hundred tons of VOC per year.

Type of operation	Resin application or gelcoat type	VOC emissions limit ¹
1. open molding—corrosion-resistant and/or high strength (CR/HS)	a. mechanical resin application b. filament application c. manual resin application	113 lb./ton. 171 lb./ton. 123 lb./ton.
2. open molding—non-CR/HS	a. mechanical resin application b. filament application c. manual resin application	88 lb./ton. 188 lb./ton. 87 lb./ton.
3. open molding—tooling	a. mechanical resin application b. manual resin application	254 lb./ton. 157 lb./ton.
4. open molding—low-flame spread/low-smoke products	a. mechanical resin application b. filament application c. manual resin application	497 lb./ton. 270 lb./ton. 238 lb./ton.

Table 2 to OAC rule 3745-21-25: VOC Emissions limits for specific open molding, centrifugal casting, pultrusion and continuous lamination/casting operations at facilities with VOC emissions less than the threshold of one hundred tons of VOC per year.

Type of operation	Resin application or gelcoat type	VOC emissions limit ¹
5. open molding—shrinkage controlled resins ²	a. mechanical resin application b. filament application c. manual resin application	354 lb./ton. 215 lb./ton. 180 lb./ton.
6. open molding—gel coat ³	a. tooling gel coating b. white/off white pigmented gel coating c. all other pigmented gel coating d. CR/HS or high performance gel coat e. fire retardant gel coat f. clear production gel coat	440 lb./ton. 267 lb./ton. 377 lb./ton. 605 lb./ton. 854 lb./ton. 522 lb./ton.
7. centrifugal casting—CR/HS	a. resin application with the mold closed, and the mold is vented during spinning and cure b. resin application with the mold closed, and the mold is not vented during spinning and cure c. resin application with the mold open, and the mold is vented during spinning and cure d. resin application with the mold open, and the mold is not vented during spinning and cure	25 lb./ton. ⁴ NA—this is considered to be a closed molding operation. 25 lb./ton. ⁴ Use the appropriate open molding emission limit. ⁵
8. centrifugal casting—non-CR/HS	a. resin application with the mold closed, and the mold is vented during spinning and cure b. resin application with the mold closed, and mold is not vented during the spinning and cure c. resin application with the mold open, and the mold is vented during spinning and cure d. resin application with the mold open,	20 lb./ton. ⁴ NA—this is considered to be a closed molding operation. 20 lb./ton. ⁴

Table 2 to OAC rule 3745-21-25: VOC Emissions limits for specific open molding, centrifugal casting, pultrusion and continuous lamination/casting operations at facilities with VOC emissions less than the threshold of one hundred tons of VOC per year.		
Type of operation	Resin application or gelcoat type	VOC emissions limit¹
	and the mold is not vented during spinning and cure	Use the appropriate open molding emission limit. ⁵
9. pultrusion ⁶	N/A	reduce total VOC emissions by at least 60 weight percent.
10. continuous lamination/casting	N/A	reduce total VOC emissions by at least 58.5 weight percent or not exceed a VOC emissions limit of 15.7 lbs. of VOC per ton of neat resin plus and neat gel coat plus.

¹VOC emissions limits for open molding and centrifugal casting are expressed as pounds of VOC per ton of resin or gel coat (pounds per ton). The operation shall be at or below these values based on a 12-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 permittee 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.

⁴For compliance purposes, calculate the VOC emission factor using only the appropriate centrifugal casting equation in item 2 of Table 1 of 40 CFR part 63, subpart WWWW, or a site-specific emission factor for after the mold is closed as discussed in paragraph (E)(1) of OAC rule 3745-21-25.

⁵ Calculate the emission factor using the appropriate open molding covered cure emission factor in item 1 of Table 1 of 40 CFR part 63, subpart WWWW, or a site-specific emission factor as discussed in paragraph (E)(1) of OAC rule 3745-21-25.

⁶ Pultrusion machines that produce parts that meet the following criteria: 1,000 or more reinforcements or the glass equivalent of 1,000 ends of 113 yield roving or more; and have a cross sectional area of 60 square inches or more are not subject to this requirement. Their requirement is the work practice of air flow management which is described in Table 1 of OAC rule 3745-21-25.

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

Compliance Options for Meeting the Standards for Pultrusion Operations Subject to the 60 Weight Percent Organic HAP Emissions Reductions and VOC Emissions Requirements

8. For pultrusion operations, the permittee shall use one or more of the options in paragraphs (I)(1) to (I)(5) of OAC rule 3745-21-25 to meet the sixty weight per cent VOC emissions limit in table 2 to OAC rule 3745-21-25 including any revisions or amendments:

Compliance Options for Pultrusion Operations Subject to the 60 Weight Percent VOC Emissions Reductions Requirement	
OAC rule 3745-21-25 for VOC Emissions	Compliance Options
(I)(1)	Achieve an overall 60 weight percent reduction in VOC emissions by capturing the organic HAP emissions and venting them to a control device or any combination of control devices. Conduct capture and destruction efficiency testing as specified in 40 CFR §63.5850 to determine the percent VOC emissions reduction.
(I)(2)	Design, install, and operate wet area enclosures and resin drip collection systems on pultrusion machines that meet the following: (a) The enclosure shall cover and enclose the open resin bath and the forming area in which reinforcements are pre-wet or wet-out and moving toward the die. The surfaces of the enclosure shall be closed except for openings to allow material to enter and exit the enclosure. (b) For open bath pultrusion machines with a radio frequency pre-heat unit, the enclosure shall extend from the beginning of the resin bath to within 12.5 inches or less of the entrance of the radio frequency pre-heat unit. If the stock that is within 12.5 inches or less of the entrance to the radio frequency pre-heat unit has any drip, it shall be enclosed. The stock exiting the radio frequency pre-heat unit is not required to be in an enclosure if the stock has no drip between the exit of the radio frequency pre-heat unit to within 0.5 inches of the entrance of the die. (c) For open bath pultrusion machines without a radio frequency pre-heat unit, the enclosure shall extend from the beginning of the resin bath to within 0.5 inches or less of the die entrance. (d) For pultrusion lines with pre-wet area prior to direct die injection, no more than 12.5 inches of open wet stock is permitted between the entrance of the first pre-wet

Compliance Options for Pultrusion Operations Subject to the 60 Weight Percent VOC Emissions Reductions Requirement	
OAC rule 3745-21-25 for VOC Emissions	Compliance Options
	<p>area and the entrance to the die. If the pre-wet stock has any drip, it shall be enclosed.</p> <p>(e) The total open area of the enclosure shall not exceed two times the cross sectional area of the puller window and shall comply with the following:</p> <p>(i) All areas that are open need to be included in the total open area calculation with the exception of access panels, doors, or hatches that are part of the enclosure.</p> <p>(ii) The area that is displaced by entering reinforcement or exiting product is considered open.</p> <p>(iii) Areas that are covered by brush covers are considered closed.</p> <p>(f) Open areas for level control devices, monitoring devices, agitation shafts, and fill hoses shall have no more than 1.0 inch clearance.</p> <p>(g) The access panels, doors, or hatches that are part of the enclosure shall close tightly. Damaged access panels, doors, or hatches that do not close tightly shall be replaced.</p> <p>(h) The enclosure may not be removed from the pultrusion line, and access panels, doors, or hatches that are part of the enclosure shall remain closed whenever resin is in the bath, except for the time period discussed in paragraph (I)(2)(i) of OAC rule 3745-21-25.</p> <p>(i) The maximum length of time the enclosure may be removed from the pultrusion line or the access panels, doors, or hatches and may be open, is thirty minutes per eight-hour shift, forty-five minutes per twelve-hour shift, or ninety minutes per day if the machine is operated for twenty-four hours in a day. The time restrictions do not apply if the open doors or panels do not cause the limit of two times the puller window area to be exceeded. Facilities may average the times that access panels, doors, or hatches are open across all operating lines. In that case the average shall not exceed the times shown in this paragraph. All lines included in the average shall have operated the entire time period being averaged.</p> <p>(j) No fans, blowers, or air lines may be allowed within the enclosure. The enclosure shall not be ventilated.</p>
(I)(3)	<p>Use direct die injection pultrusion machines with resin drip collection systems that meet the following:</p> <p>(a) All the resin that is applied to the reinforcement is delivered directly to the die.</p> <p>(b) No exposed resin is present, except at the face of the die.</p> <p>(c) Resin drip is captured in a closed system and recycled back to the process.</p>
(I)(4)	<p>Use a preform injection system that meets the definition in paragraph (GG) of OAC rule 3745-21-01.</p>

Compliance Options for Pultrusion Operations Subject to the 60 Weight Percent VOC Emissions Reductions Requirement	
OAC rule 3745-21-25 for VOC Emissions	Compliance Options
(I)(5)	Use any combination of options in paragraphs (I)(1) to (I)(4) of OAC rule 3745-21-25 in which different pultrusion lines comply with different options described in paragraphs (I)(1) to (I)(4) of OAC rule 3745-21-25, in addition to one of the following: (a) Each individual pultrusion machine meets the sixty per cent reduction requirement. (b) The weighted average reduction based on resin throughput of all pultrusion machines combined is sixty per cent. For purposes of the average per cent reduction calculation, wet area enclosures reduce VOC emissions by sixty per cent, and direct die injection and preform injection reduce VOC emissions by ninety per cent. For averaging purposes, zero reduction credit is earned during production on lines that have not installed and operated enclosures or injection systems as described in paragraphs (I)(2) to (I)(4) of OAC rule 3745-21-25.

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

Monitoring and Recordkeeping Requirements for Continuous Compliance

Continuous Compliance Requirements

9. The permittee shall demonstrate continuous compliance with each VOC control requirement that is applicable including but not limited to the following requirements including any revisions or amendments:

OAC rule 3745-21-25 for VOC Emissions	Applicable Continuous Compliance Requirement
(O)(1)(a)(i)	If using an add-on control device, the permittee shall follow the procedures in 40 CFR part 63, subpart SS, which include the use of continuous parameter monitors. Affected operations using add-on control devices may also use continuous emissions monitors to demonstrate continuous compliance as an alternative to continuous parameter monitors.
(O)(1)(a)(ii)	Compliance with VOC emissions limits is demonstrated by maintaining a VOC emissions factor value less than or equal to the appropriate VOC emissions limit listed in table 2 or table 3 of this rule, on a twelve-month rolling average, or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate VOC emissions limits, as discussed in paragraph (O)(2)(c) of OAC rule 3745-21-25.
(O)(1)(a)(iv)	Compliance with the work practice standards in table 1 of this rule is demonstrated by performing the work practice required for the affected operation.

OAC rule 3745-21-25 for VOC Emissions	Applicable Continuous Compliance Requirement
(O)(1)(b)	The permittee shall report each deviation from each VOC control requirement in paragraph (D) of this rule that applies. The deviations shall be reported according to paragraph (Q) of OAC rule 3745-21-25.
(O)(1)(c)	Except as provided in paragraph (O)(1)(d) of this rule for an add-on control device, during periods of startup, shutdown or malfunction, the owner or operator shall meet the VOC emissions limits and work practice standards that apply.

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

Recordkeeping Requirements and Retention Requirements for Records and Reports

10. The permittee shall retain all applicable data and records under OAC rule 3745-21-25, including but not limited to the following sections including any revisions or amendments:

OAC rule 3745-21-25	Applicable Data and Records Requirement
(O)(2)(b)	Records of resin and gel coat use, monomer content and operation where resin is used.
(O)(2)(d)	For each pultrusion machine, the permittee shall record all times that doors or covers of wet area enclosures are open and there is resin present in the resin bath.
(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.
(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.
(P)(1)(e)	A certified statement that operations are in compliance with the applicable work practice standards specified in Table 1 of OAC rule 3745-21-25.
(P)(4)	Record keeping retention requirements.

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

Notification and Reporting Requirements

Notification Requirements

11. The applications for a PTI P0121642, submitted under OAC rule 3745-31-02, fulfills the initial notification requirements of OAC rule 3745-21-25(S)(2).

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

Reporting Requirements

12. The permittee shall submit semiannual reports and such other notifications and reports to the Ohio EPA, NEDO as are required in OAC rule 3745-21-25, including but not limited to the following sections including any revisions or amendments:

OAC rule 3745-21-25	Applicable Reporting Requirements
(Q)(1) and (2)	Semiannual compliance reports
(Q)(3)(a) through (h)	Content of semiannual compliance reports
(Q)(3)(h)	Where multiple compliance options are available, the permittee must state in the next compliance report if the compliance options have changed since the last compliance report.
(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 paragraph (D)(3) of this rule.
(Q)(5)	Each facility that has obtained a Title V permit pursuant to Chapter 3745-77 of the Administrative Code shall report all deviations as described in this rule in the semiannual monitoring report required by the Title V permit. If the facility submits a semiannual compliance report pursuant to this rule along with, or as part of, the semiannual monitoring report required by the facility's Title V permit, and the semiannual compliance report includes all required information concerning deviations from any VOC emissions limitation, operating limit, or work practice standard in this rule, submission of the semiannual compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the Ohio EPA NEDO.

- a) The permittee of a facility that has reinforced plastic composites production operations subject to OAC rule 3745-21-25 shall submit semiannual compliance status reports containing the information specified in paragraphs (Q)(3)(a) to (Q)(3)(h) of this rule. The semiannual compliance status reports shall be submitted no later than thirty calendar days after the end of each six-month period to the Ohio EPA NEDO. The first compliance report shall cover the period beginning on the compliance date that is specified in paragraph (R) of this rule and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified in paragraph (R) of this rule.
- b) Each subsequent compliance report shall cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
- c) For each facility that is subject to permitting requirements pursuant to Chapter 3745-77 of the Administrative Code (pertaining to Title V permits), the permittee may submit the first and subsequent

semiannual compliance reports according to the dates established within the facility's Title V permit, instead of according to the dates specified in paragraph (Q)(1) of OAC rule 3745-21-25.

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

Testing (Performance) Requirements

Calculation of Facility's VOC emissions Threshold

13. For new facilities prior to startup, the permittee shall calculate a weighted average VOC emissions factor for the operations specified in paragraph (F)(1) of OAC rule 3745-21-25 on a pounds of VOC per ton of resin, monomer, or gel coat basis. Base the weighted average on the projected operation for the 12 months subsequent to facility startup. Multiply the weighted average VOC emissions factor by projected resin, monomer, or gel coat use over the same period. The permittee may calculate a VOC emissions factor based on the factors in Table 1 of 40 CFR Part 63, Subpart WWWW, or may use any VOC emissions factor approved by U.S. EPA, such as factors from AP-42, or VOC emissions test data from similar facilities. The organic HAP emissions factors in Table 1 of 40 CFR Part 63, Subpart WWWW are equivalent to the VOC emissions factors for OAC rule 3745-21-25.

[Authority for term: 40 CFR Part 63, Subpart WWWW, OAC rule 3745-21-25 and OAC rule 3745-77-07(C)(1)]

14. After the initial compliance date, existing and new facilities shall calculate VOC emissions over the 12-month period ending June 30 or December 31, whichever date is the first date following the compliance date specified in paragraph (R) of OAC rule 3745-21-25. Subsequent calculations should cover the periods in the semiannual compliance reports.

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

C. Emissions Unit Terms and Conditions

1. P010

Operations, Property and/or Equipment Description:

50 lb. Mixer for polyester resin-styrene and epoxy resin mixtures with a dust control device (WF#1) to control PE.

- 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)	<p>The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled PTE is less than 10 TPY.</p> <p>The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from this air contaminant source since the controlled PTE is less than 10 TPY taking into account the voluntary restriction per OAC rule 3745-31-05(E).</p>
b.	OAC rule 3745-31-05(E)	See c)(1).
c.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack serving this EU shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
d.	OAC rule 3745-17-11(B)(1)	PE shall not exceed 0.551 lb./hr., the rate allowed by Table I to OAC rule 3745-17-11.
e.	OAC rule 3745-21-25	VOC emissions shall not exceed the applicable VOC control requirements specified in OAC rule 3745-21-25(D) including the work practice standards in Table 1.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See B.3., B.4., B.5., B.6., B.7., B.8., B.9., B.10., B.11., B.12., B.13. and B.14.
f.	40 CFR Part 63, Subpart WWWW	Organic HAP emissions shall not exceed the applicable standards specified in 40 CFR §63.5805 including complying with the work practice standards in Table 4 of 40 CFR 63 Subpart WWWW.
g.	40 CFR §63.1 - §63.15	Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63 shows which parts of the General Provisions in 40 CFR 63.1 – 63.15 apply.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall operate the dust control system (e.g. WF#1) to control PE whenever this EU is in operation.

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

(2) OAC rule 3745-21-25 work practice standards:

a. See B.6.

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

(3) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935).

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any time periods when the dust control system was not in service when the EU was in operation.

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

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



- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any VE incident; and
- e. any corrective actions taken to minimize or eliminate the VE.

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

- (3) If VE are present, a VE incident has occurred. The observer does not have to document the exact start and end times for the VE incident under item d)(2)d above or continue the weekly check until the incident has ended. The observer may indicate that the VE incident was continuous during the observation period (or, if known, continuous during the operation of the EU). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the VE were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the EU continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal VE.

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

- (4) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935).

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

- (5) OAC rule 3745-21-25 Continuous Compliance Requirements

- a. See B.9.

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

- (6) OAC rule 3745-21-25 Recordkeeping Requirements and Retention Requirements for Records and Reports

- a. See B.10.

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

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that identify:
 - a. any daily record showing that the dust control system (e.g. (WF#1)) for this EU was not in service when the EU was in operation;
 - b. all days during which any visible PE were observed from the stack serving this EU; and
 - c. any corrective actions taken to minimize or eliminate the visible PE.

These reports shall be submitted to the Director (the Ohio EPA NEDO) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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

- (2) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935)

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

- (3) The permittee shall submit semiannual reports for each 6-month reporting period, as required in OAC rule 3745-21-25 and shall include the following information for each EU and/or group of EUs that employ the same VOC emission limit and the same compliance option:

- a. the EU identification number(s) (e.g. P010);
- b. a statement of the compliance status of the applicable work practice standards in Table 1 to OAC rule 3745-21-25;
- c. if applicable, information regarding corrective actions, required by paragraph (Q)(3)(f) of OAC rule 3745-21-25, for deviations of the applicable work practice standards; and
- d. other information required by OAC rule 3745-21-25(Q). See B.12.

See B.12.a) through c) for the semiannual report due dates.

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

- (4) The permittee shall report estimates of the air pollutant emissions, in TPY, for the 12-month period ending on December 31 for the EU in the annual fee emissions report.

[Authority for term: ORC 3745.11 and OAC rule 3745-78-02 and OAC rule 3745-77-07(C)(1)]

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

[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. Emission Limitation:

Visible PE from the stack serving this EU shall not exceed 20% opacity as a 6-minute average, except as specified by the rule.

Applicable Compliance Method:

If required, compliance with the stack visible PE limitation shall be demonstrated through VE observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A-4, Method 9.

[Authority for term: OAC rule 3745-17-03(B)(1)(a) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

The PE rate shall not exceed 0.551 lb./hr.

Applicable Compliance Method:

- i. The maximum, uncontrolled hourly emissions may be estimated by the following equation:

$$PE_{UNCTRL} = \text{lbs. solids/hr.} \times EF$$

where:

$PE_{UNCTRL} = PM_{UNCTRL\ 10} = PM_{UNCTRL\ 2.5}$ = the uncontrolled rate of PE, and the uncontrolled emissions of PM_{10} and $PM_{2.5}$, which were estimated to be 0.30 lb. PE_{UNCTRL} /hr., 0.30 lb. $PM_{UNCTRL\ 10}$ /hr. and 0.30 lb. $PM_{UNCTRL\ 2.5}$ /hr., respectively;

lbs. solids/hr. = maximum solid input to the mixer, which is 30 lbs. solids/hr. as noted in the application(s) for PTI P0121642; and

$EF = 0.01 \text{ lb. } PE_{UNCTRL}/\text{lb. solids} = 0.01 \text{ lb. } PM_{10\ UNCTRL}/\text{lb. solids} = 0.01 \text{ lb. } PM_{2.5\ UNCTRL}/\text{lb. solids}$ as adapted from 20 lbs. PE_{UNCTRL} /ton pigment solids for paint manufacture in U.S. EPA AP42 Chap. 6.4 (05/1983) for Paint & Varnish Manufacturing.

- ii. The maximum, controlled hourly emissions may be estimated by the following equation:

$$PE \text{ (lb./hr.)} = PE_{UNCTRL} \times \text{Control}_{Overall}$$

where:

$PE \text{ (lb./hr.)} = PM_{10} \text{ (lb./hr.)} = PM_{2.5} \text{ (lb./hr.)}$ = the controlled rate of PE, and the controlled emissions of PM_{10} and $PM_{2.5}$, which were estimated to be 0.0159 lb. PE /hr., 0.0159 lb. PM_{10} /hr. and 0.0159 lb. $PM_{2.5}$ /hr., respectively.

$$\text{Control}_{Overall} = \text{Capture Efficiency} \times CE/100$$

$\text{Control}_{Overall}$ = overall efficiency of the capture-control system to control pollutant emissions, which was estimated to be 94.97% for the PE rate and emissions of PM_{10} and $PM_{2.5}$;

Capture Efficiency = the efficiency of the system to capture the uncontrolled air pollutant emissions, which is 95% as stated in the application(s) for PTI P0121642; and

CE = the efficiency of the dust control device to control the captured air pollutant emissions, which is 99.97% per the filter fabric manufacturer's specification for captured $PM_{2.5}$ emissions when the exhaust flow was 2000 acfm

at 1.34 inches W.G. pressure drop for the proposed high capacity, HEPA filters as stated in the application(s) for PTI P0121642.

If required, compliance with the allowable PE limitation shall be demonstrated in accordance with the following method(s): Methods 1 through 4 and Method 5 of 40 CFR Part 60, Appendices A1 through A3.

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

c. Emission Limitation and/or Control Requirements:

Organic HAP emissions shall not exceed the applicable standards specified in 40 CFR §63.5805 including complying with the work practice standards in Table 4 of 40 CFR 63 Subpart WWWW.

Applicable Compliance Method:

The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart WWWW. See 40 CFR Part 63 Subpart WWWW (40 CFR 63.5780-63.5935).

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

d. Emission Limitation and/or Control Requirements:

Table 1 to OAC rule 3745-21-25 Applicable work practice standards

Applicable Compliance Method:

Compliance shall be demonstrated based upon the work practice requirements specified in d)(5) and the record keeping requirements specified in d)(6).

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

g) **Miscellaneous Requirements**

(1) The annual PTE from EU P010 was estimated to be the following: 1.10 tons VOC emissions, as styrene, a HAP; and 0.0696 ton PM₁₀ and 0.0696 ton PM_{2.5}. The potential PM₁₀ and PM_{2.5} emissions estimates consider the use of air pollution control system(s) required by OAC rule 3745-31-05(A)(3).

(2) For the 12-month period ending on December 31 for the EU in the annual fee emissions report, the actual, annual OC and VOC emissions may be estimated by the following equation(s):

$$\text{OC-VOC(TPY)} = \left\{ \sum_{i=1 \dots n} (\text{lbs. resin}_i / \text{month} \times \text{lb. styrene} / \text{lb. resin}_i) \right. \\ \left. + \text{lbs. styrene monomer} / \text{month} \times \text{EF} \right\} \times \text{ton OC-VOC} / 2000 \text{ lbs. OC-VOC}$$

where:

OC-VOC(TPY) = the estimated OC-VOC emissions, in TPY;

lbs. resin_i/month = the monthly usages of each resin i, in lbs;

lb. styrene/lb. resin_i = the styrene content of each resin i, as a decimal fraction;

lbs. styrene monomer/month = the monthly usages of styrene monomer, in lbs;

EF = the factor for OC-VOC emissions, which is 0.01 lb. VOC/lb. styrene exhaust derived from a factor of 20 lb. VOC/2000 lbs. acrylic varnish product from U.S. EPA AP42 Chap. 6.4 (05/1983) for Paint & Varnish Manufacturing;

i = a specific resin employed during the month; and

n = total number of resins employed during the month.

A site-specific emission factor and/or alternative calculations may be used if more representative of materials employed and/or site operation(s).

- (3) A review of the safety data sheet for processing Hexion E826 /A100, an epoxy resin type, and process operations determined that negligible, if any, VOC emissions would be generated from use at a mixer.

2. P011

Operations, Property and/or Equipment Description:

Vertical saw with a baghouse (DC #1) to control PE.

- 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) d)(7).

- 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)	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from this air contaminant source since the controlled PTE is less than 10 TPY, taking into account the voluntary restriction per OAC rule 3745-31-05(E).
b.	OAC rule 3745-31-05(E)	See b)(2)a.
c.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack(s) serving this EU shall not exceed 20% opacity as a 6-minute average each, except as provided by the rule.
d.	OAC rule 3745-17-11(B)(1)	PE shall not exceed 0.92 lb./hr., the rate allowed by Table 1 to OAC rule 3745-17-11. See b)(2)a.

- (2) Additional Terms and Conditions

- a. The emissions from this EU shall be vented to a baghouse at all times the EU is in operation. EUs P001 - P007, P008, P011 and P012 share a common baghouse.

- c) Operational Restrictions

- (1) None.



d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1 to 5 inches of water.

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

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled EU(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

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

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

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

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;



- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

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

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

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

- (3) The permittee shall maintain daily records that document any time periods when the dust control system was not in service when the EU was in operation.

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

- (4) The permittee shall perform weekly checks, when any of the EUs is in operation and when the weather conditions allow, for any visible PE from the stack(s) serving these EUs. The presence or absence of any VE shall be noted in an operations log. If VE are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any VE incident; and
- e. any corrective actions taken to minimize or eliminate the VE.

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

- (5) If VE are present, a VE incident has occurred. The observer does not have to document the exact start and end times for the VE incident under item d)(4)d above or continue the weekly check until the incident has ended. The observer may indicate that the VE incident was continuous during the observation period (or, if known, continuous during the operation of the EU). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the VE were representative of normal operations, or specify the

minor corrective actions that were taken to ensure that the EU continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal VE.

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

- (6) The permittee shall maintain monthly records of data to estimate the emissions of air pollutants for this EU. For example, the monthly usages of each material type employed, in tons of material, may be multiplied by the appropriate emissions factor, determined from the methods specified in f), or a site-specific emissions factor, to estimate monthly emissions, in tons/month.

[Authority for term: ORC 3745.11 and OAC rule 3745-78-02 and OAC rule 3745-77-07(C)(1)]

- (7) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the EU's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 TPY. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 TPY may require the permittee to apply for and obtain a new PTI.

[Authority for term: ORC 3704.03(F)(3)(c) and (F)(4) and OAC rule 3745-77-07(C)(1)]

e) **Reporting Requirements**

- (1) The permittee shall submit semiannual written reports that identify:
- a. any daily record showing that the dust control system (e.g. (DC#1)) for this EU was not in service when the EU was in operation;
 - b. all days during which any visible PE were observed from the stack serving this EU; and
 - c. any corrective actions taken to minimize or eliminate the visible PE.

These reports shall be submitted to the Director (the Ohio EPA NEDO) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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

- (2) The permittee shall submit quarterly deviation reports that identify:
- a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the EU(s) was/were in operation and the process emissions were not vented to the baghouse;



- c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;
- d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

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

- (3) The permittee shall report estimates of the air pollutant emissions, in TPY, for the 12-month period ending on December 31 for the EU in the annual fee emissions report.

[Authority for term: ORC 3745.11 and OAC rule 3745-78-02 and OAC rule 3745-77-07(C)(1)]

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

[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. Emission Limitation:

Visible PE from the stack serving this EU shall not exceed 20% opacity as a 6-minute average, except as specified by the rule.

Applicable Compliance Method:

If required, compliance with the stack visible PE limitation shall be demonstrated through VE observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A-4, Method 9.

[Authority for term: OAC rule 3745-17-03(B)(1)(a) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

The PE rate shall not exceed 0.92 lb./hr.

Applicable Compliance Method:

- i. The maximum, uncontrolled hourly emissions may be estimated by the following equation:



$$PE_{UNCTRL} = \text{cycles/hr.} \times EF$$

where:

$PE_{UNCTRL} = PM_{UNCTRL\ 10} = PM_{UNCTRL\ 2.5}$ = the uncontrolled rate of PE, and the uncontrolled emissions of PM_{10} and $PM_{2.5}$, which were estimated to be 2.203 lbs. PE_{UNCTRL} /hr., 2.203 lbs. $PM_{UNCTRL\ 10}$ /hr. and 2.203 lbs. $PM_{UNCTRL\ 2.5}$ /hr., respectively;

cycles/hr. = maximum number of cycles (cuts) per hour, which is 37 cycles/hr. as noted in the application(s) for PTI P0121642; and

EF = emission factor, which is 0.0648 lb. dust generated per cycle from an in-house study at Iten Industries, Plant 3 (0204010442) as noted in the application(s) for PTI P0121642.

- ii. The maximum, controlled hourly emissions may be estimated by the following equation:

$$PE\ (\text{lb./hr.}) = PE_{UNCTRL} \times \text{Control}_{Overall}$$

where:

$PE\ (\text{lb./hr.}) = PM_{10}\ (\text{lb./hr.}) = PM_{2.5}\ (\text{lb./hr.})$ = the controlled rate of PE, and the controlled emissions of PM_{10} and $PM_{2.5}$, which were estimated to be 0.116 lb. PE /hr., 0.116 lb. PM_{10} /hr. and 0.116 lb. $PM_{2.5}$ /hr., respectively;

$$\text{Control}_{Overall} = \text{Capture Efficiency} \times CE/100;$$

$\text{Control}_{Overall}$ = overall efficiency of the capture-control system to control pollutant emissions, which was estimated to be 94.97% for the PE rate and emissions of PM_{10} and $PM_{2.5}$;

Capture Efficiency = the efficiency of the system to capture the uncontrolled air pollutant emissions, which is 95% as stated in the application(s) for PTI P0121642; and

CE = the efficiency of the dust control device to control the captured air pollutant emissions, which is 99.99819% for captured $PM_{2.5}$ emissions and a mean outlet concentration of 0.0001146 grain $PM_{2.5}$ /dscf derived from a verification (performance) test of the Clear Edge Filtration/SF PESN 1630 SST filter fabric.

If required, compliance with the allowable PE limitation shall be demonstrated in accordance with the following method(s): Methods 1 through 4 and Method 5 of 40 CFR Part 60, Appendices A1 through A3.

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

g) Miscellaneous Requirements

- (1) The annual PTE air pollutant emissions from P011 was estimated to be the following: 0.508 ton PM_{10} and 0.508 ton $PM_{2.5}$. The potential PM_{10} and $PM_{2.5}$ emissions estimates consider the use of air pollution control system(s) required by OAC rules 3745-17-11(B)(1) and 3745-31-05(A)(3).



3. P013

Operations, Property and/or Equipment Description:

Facility-wide cleanup

- 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) d)(6).

- 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)	Exempt from the BAT requirements since OC emissions are not an air contaminant or a precursor of an air contaminant for which a NAAQS has been adopted under the CAA.
b.	OAC rule 3745-21-25	VOC emissions shall not exceed the applicable VOC control requirements specified in OAC rule 3745-21-25(D). See B.3., B.4., B.5., B.6., B.7., B.9., B.10., B.11., B.12., B.13. and B.14. The permittee shall meet the applicable work practice standards in Table 1 of OAC rule 3745-21-25 for affected operations. See b)(2)a. through b)(2)d.
c.	40 CFR Part 63, Subpart WWWW	Organic HAP emissions shall meet the applicable standards specified in 40 CFR §63.5805 including the work practice standards in Table 4 of 40 CFR 63 Subpart WWWW.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR §63.1 – §63.15	Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63 shows which parts of the General Provisions in 40 CFR 63.1 – 63.15 apply.

(2) Additional Terms and Conditions

- a. For a cleaning operation (cleaning of equipment used in reinforced plastic composites manufacture), the permittee must not use cleaning solvents (cleaners) that have a VOC content greater than 0.42 pound VOC per gallon, except cleaners used in closed systems and used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
- b. "Cleaning" means removal of composite materials, such as cured and uncured resin from equipment, finished surfaces, floors, hands of employees, or any other surfaces.
- c. For a VOC-containing materials storage operation, the permittee shall keep containers that store VOC-containing materials closed or covered except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety.
- d. The following operations and materials are specifically excluded from any requirements in OAC rule 3745-21-25:
 - i. application of mold sealing and release agents;
 - ii. mold stripping and cleaning; and
 - iii. repair of reinforced plastic composite parts that the facility did not manufacture, including non-routine manufacturing of parts.
- e. See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935)

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935)
[Authority for term: 40 CFR Part 63, Subpart WWWW and OAC rule 3745-77-07(C)(1)]
- (2) OAC Rule 3745-21-25 Continuous Compliance Requirements
 - a. See B.9.
[Authority for term: OAC rule 3745-21-25 and OAC rule 3745-77-07(C)(1)]

- (3) OAC Rule 3745-21-25 Recordkeeping Requirements and Retention Requirements for Records and Reports

a. See B.10.

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

- (4) The permittee shall maintain records of the following information for this EU:

- a. the identification of each cleanup material used;
- b. the VOC content of each neat cleanup material, in lbs./gal., of cleanup material;
- c. an identification of each neat cleanup material as HAP-containing or non-HAP-containing; and
- d. the density and the weight fraction or volume fraction of VOC, OC and HAP of each cleanup material used.

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

- (5) The permittee shall maintain monthly records and shall include the following information for this EU:

- a. the identification of each cleanup material used;
- b. the weight or volume of each cleanup material used;
- c. if a VOC-containing neat cleanup material or a HAP-containing neat cleanup material is used, a statement of whether the material was used in a closed system;
- d. the emissions of VOC and OC for all cleanup materials used, in lbs./month. See d)(6)e.;
- e. if a credit for recovered cleanup materials is to be used, records of the total amount, in lbs., of cleanup material collected and added to the recovery container, for recycle, recovery, and/or disposal at an outside facility, shall be maintained in the following manner:
 - i. the date the materials from the recovery container were shipped off site;
 - ii. the number of gallons or pounds of materials from the recovery container shipped off site; and
 - iii. a credit of recovered cleanup materials may be used to adjust the amount of VOC and OC emissions in d)(6)d.

[Authority for term: OAC rule 3745-21-25, ORC 3745.11, OAC rule 3745-78-02 and OAC rule 3745-77-07(C)(1)]

- (6) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the EU's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 TPY. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that

changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 TPY may require the permittee to apply for and obtain a new PTI.

[Authority for term: ORC 3704.03(F)(3)(c) and (F)(4) and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935)

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

- (2) The permittee shall submit semiannual reports for each 6-month reporting period, as required in OAC rule 3745-21-25 and shall include the following information for each EU and/or group of EUs that employ the same VOC emission limit and the same compliance option:

- a. the EU identification number(s) (e.g. P013);
- b. a statement of the compliance status of the applicable work practice standards in Table 1 to OAC rule 3745-21-25;
- c. if applicable, information regarding corrective actions, required by paragraph (Q)(3)(f) of OAC rule 3745-21-25, for deviations of the applicable work practice standards; and
- d. other information required by OAC rule 3745-21-25(Q). See B.22.

See B.22.a) through c) for the semiannual report due dates.

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

- (3) The permittee shall report estimates of the air pollutant emissions, in TPY, for the 12-month period ending on December 31 for the EU in the annual fee emissions report.

[Authority for term: ORC 3745.11 and OAC rule 3745-78-02 and OAC rule 3745-77-07(C)(1)]

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

[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. Emission Limitation and/or Control Requirements:

Organic HAP emissions shall not exceed the applicable standards specified in 40 CFR §63.5805 including complying with the work practice standards in Table 4 of 40 CFR 63 Subpart WWWW.

Applicable Compliance Method:

The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart WWWW. See 40 CFR Part 63 Subpart WWWW (40 CFR 63.5780-63.5935).

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

b. Emission Limitation and/or Control Requirements:

Table 1 to OAC rule 3745-21-25 Applicable work practice standards.

Applicable Compliance Method:

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

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

g) Miscellaneous Requirements

- (1) The annual PTE OC emissions, as acetone, a non-VOC and a non-HAP, were estimated to be 24.52 tons from EU P013.
- (2) For the 12-month period ending on December 31 for the EU in the annual fee emissions report, the actual, annual OC and VOC emissions may be estimated by the summation of the monthly emissions from the records of emission estimates required by d)(4).

4. P020, TMP Press 402400

Operations, Property and/or Equipment Description:

Compression mold press 402400 using thermoplastic resin for composite plastics production.

- 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)	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled PTE is less than 10 TPY.
b.	OAC rule 3745-21-25	VOC emissions shall not exceed the applicable VOC control requirements specified in OAC rule 3745-21-25(D) including the work practice standards in Tables 1. See B.3., B.4., B.5., B.6., B.7., B.9., B.10., B.11., B.12., B.13. and B.14.
c.	40 CFR Part 63, Subpart WWWW	Organic HAP emissions shall not exceed the applicable standards specified in 40 CFR §63.5805 including the work practice standards in Table 4 of Subpart WWWW. See b(2)a.,
d.	40 CFR §63.1 - §63.15	Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63 shows which

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		parts of the General Provisions in 40 CFR 63.1 – 63.15 apply.

(2) Additional Terms and Conditions

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

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935).
[Authority for term: 40 CFR Part 63, Subpart WWWW and OAC rule 3745-77-07(C)(1)]
- (2) OAC rule 3745-21-25 Continuous Compliance Requirements
 - a. See B.9.
[Authority for term: OAC rule 3745-21-25 and OAC rule 3745-77-07(C)(1)]
- (3) OAC rule 3745-21-25 Recordkeeping Requirements and Retention Requirements for Records and Reports
 - a. See B.10.
[Authority for term: OAC rule 3745-21-25 and OAC rule 3745-77-07(C)(1)]
- (4) The permittee shall maintain monthly records of data to estimate the emissions of air pollutants for this EU. For example, the monthly usages of each material type employed, in tons of material, may be multiplied by the appropriate emissions factor, determined from the methods specified in f), or a site-specific emissions factor, to estimate monthly emissions, in tons/month.

[Authority for term: ORC 3745.11, OAC rule 3745-78-02 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935).



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

- (2) The permittee shall submit semiannual reports for each 6-month reporting period, as required in OAC rule 3745-21-25 and shall include the following information for each EU and/or group of EUs that employ the same VOC emission limit and the same compliance option:
- the EU identification number(s) (e.g. P020);
 - a statement of the compliance status of the applicable work practice standards in Table 1 to OAC rule 3745-21-25;
 - if applicable, information regarding corrective actions, required by paragraph (Q)(3)(f) of OAC rule 3745-21-25, for deviations of the applicable work practice standards; and
 - other information required by OAC rule 3745-21-25(Q). See B.12.

See B.12.a) through c) for the semiannual report due dates.

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

- (3) The permittee shall report estimates of the air pollutant emissions, in TPY, for the 12-month period ending on December 31 for the EU in the annual fee emissions report.

[Authority for term: ORC 3745.11 and OAC rule 3745-78-02 and OAC rule 3745-77-07(C)(1)]

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

[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. **Emission Limitation and/or Control Requirements:**

Organic HAP emissions shall not exceed the applicable standards specified in 40 CFR §63.5805 including complying with the work practice standard in Table 4 of 40 CFR 63 Subpart WWWW.

Applicable Compliance Method:

The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart WWWW. See 40 CFR Part 63 Subpart WWWW (40 CFR 63.5780-63.5935).

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

b. Emission Limitation and/or Control Requirements:

Table 1 to OAC rule 3745-21-25 Applicable work practice standards

Applicable Compliance Method:

Compliance shall be demonstrated based upon the work practice requirements specified in d)(2) and the record keeping requirements specified in d)(3).

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

g) Miscellaneous Requirements

- (1) The annual PTE air pollutant emissions from EU P020 was estimated to be 2.15 tons VOC emissions, as styrene, a HAP.
- (2) For the 12-month period ending on December 31 for the EU in the annual fee emissions report, the actual, annual OC and VOC emissions may be estimated by the following equation(s):

$$\text{OC-VOC(ton/yr.)} = (EF) \sum_{i=1}^n [(WT \times HAP)]_i$$

where:

WT = the actual weight of mold compound or resin paste “i” employed, in lbs./month;

HAP = the actual weight percent of available organic HAP used (e.g., styrene) in each mold compound or resin, as a decimal fraction in lb. styrene/lb. mold compound or resin paste;

EF = an emissions factor for HAP emissions which is 0.015 lb. HAP emissions per lb. of available organic HAP input from American National Standards Institute, Inc. and American Composites Manufacturers Association. (2011). *ANSI/ACMA/IICPA UEF-1-2011a: Estimating emission factors from open molding and other composite processes*. The emissions factor was developed from styrene emission testing for SMC Compression Molding, conducted beginning August 11, 2008, ending September 4, 2008 by Engineering Environmental Consulting Services. Equivalent, alternative method(s), as approved by Ohio EPA may be employed;

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

n = total number of mold compounds employed during the month.

A site-specific emission factor and/or alternative calculations may be used if more representative of materials employed and/or site operation(s).

5. EU Group - Injection Mold Presses: P048, P049, P050, P051, P052, P053, P054 and P055

EU ID	Operations, Property and/or Equipment Description
P048	Injection Press 1
P049	Injection Press 2
P050	Injection Press 3
P051	Injection Press 4
P052	Injection Press 5
P053	Injection Press 6
P054	Injection Press 7
P055	Injection Press 8

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

(1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operation(s), property, and/or equipment that constitute each 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)	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled PTE is less than 10 TPY.
b.	OAC rule 3745-21-25	VOC emissions shall not exceed the applicable VOC control requirements specified in OAC rule 3745-21-25(D) including the work practice standards in Tables 1.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See B.3., B.4., B.5., B.6., B.7., B.9., B.10., B.11., B.12., B.13. and B.14.
c.	40 CFR Part 63, Subpart WWWW	Organic HAP emissions shall not exceed the applicable standards specified in 40 CFR 63.5805 including the work practice standards in Table 4 of Subpart WWWW. See b)(2)a.
d.	40 CFR 63.1 - 63.15	Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63 shows which parts of the General Provisions in 40 CFR 63.1 – 63.15 apply.

(2) Additional Terms and Conditions

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

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935).
[Authority for term: 40 CFR Part 63, Subpart WWWW and OAC rule 3745-77-07(C)(1)]
- (2) OAC rule 3745-21-25 Continuous Compliance Requirements
 - a. See B.9.

[Authority for term: OAC rule 3745-21-25 and OAC rule 3745-77-07(C)(1)]
- (3) OAC rule 3745-21-25 Recordkeeping Requirements and Retention Requirements for Records and Reports
 - a. See B.10.

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

- (4) The permittee shall maintain monthly records of data to estimate the emissions of air pollutants for this EU. For example, the monthly usages of each material type employed, in tons of material, may be multiplied by the appropriate emissions factor, determined from the methods specified in f), or a site-specific emissions factor, to estimate monthly emissions, in tons/month.

[Authority for term: ORC 3745.11, OAC rule 3745-78-02 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935).

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

- (2) The permittee shall submit semiannual reports for each 6-month reporting period, as required in OAC rule 3745-21-25 and shall include the following information for each EU and/or group of EUs that employ the same VOC emission limit and the same compliance option:

- a. the EU identification number(s) (e.g. P048);
- b. a statement of the compliance status of the applicable work practice standards in Table 1 to OAC rule 3745-21-25;
- c. if applicable, information regarding corrective actions, required by paragraph (Q)(3)(f) of OAC rule 3745-21-25, for deviations of the applicable work practice standards; and
- d. other information required by OAC rule 3745-21-25(Q). See B.12.

See B.12.a) through c) for the semiannual report due dates.

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

- (3) The permittee shall report estimates of the air pollutant emissions, in TPY, for the 12-month period ending on December 31 for the EU in the annual fee emissions report.

[Authority for term: ORC 3745.11 and OAC rule 3745-78-02 and OAC rule 3745-77-07(C)(1)]

- (4) The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Section A, Standard terms and conditions.

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

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

[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. Emission Limitation and/or Control Requirements:

Organic HAP emissions shall not exceed the applicable standards specified in 40 CFR Part 63.5805 including complying with the work practice standard in Table 4 of 40 CFR 63 Subpart WWWW.

Applicable Compliance Method:

The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart WWWW. See 40 CFR Part 63 Subpart WWWW (40 CFR 63.5780-63.5935).

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

b. Emission Limitation and/or Control Requirements:

Table 1 to OAC rule 3745-21-25 Applicable work practice standards

Applicable Compliance Method:

Compliance shall be demonstrated based upon the work practice requirements specified in d)(2) and the record keeping requirements specified in d)(3).

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

g) Miscellaneous Requirements

- (1) The annual, PTE air pollutant emissions from EUs P048-P055 were estimated to be 6.4 tons VOC emissions combined, as styrene, a HAP.
- (2) For the 12-month period ending on December 31 for the EUs in the annual fee emissions report, the actual, annual OC and VOC emissions may be estimated by the following equation(s):

$$\text{OC-VOC(ton/yr.)} = (EF) \sum_{i=1}^n [(WT \times HAP)]_i$$

where:

WT = the actual weight of mold compound or resin paste “i” employed, in lbs./month;

HAP = the actual weight percent of available organic HAP used (e.g., styrene) in each mold compound or resin, as a decimal fraction in lb. styrene/lb. mold compound or resin paste;

EF = an emissions factor for HAP emissions which is 0.015 lb. HAP emissions per lb. of available organic HAP input from American National Standards Institute, Inc. and American Composites Manufacturers Association. (2011). *ANSI/ACMA/IICPA UEF-1-2011a: Estimating emission factors from open molding and other composite processes*. The emissions factor was developed from styrene emission testing for SMC Compression Molding, conducted beginning August 11, 2008, ending September 4, 2008 by Engineering Environmental Consulting Services. Equivalent, alternative method(s), as approved by Ohio EPA may be employed;

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

n = total number of mold compounds employed during the month.

A site-specific emission factor and/or alternative calculations may be used if more representative of materials employed and/or site operation(s).

6. EU Group - Large Mixers: P009, P014 and P015

EU ID	Operations, Property and/or Equipment Description
P009	Mixer no. 1 for polyester resin-styrene mixtures with a passive wall filter (WF#1) to control particulate emissions.
P014	Mixer no. 2 for polyester resin-styrene mixtures with a passive wall filter (WF#1) to control particulate emissions.
P015	Mixer no. 3 for polyester resin-styrene mixtures with a passive wall filter (WF#1) to control particulate emissions.

- 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)	<p>For the VOC emissions, the requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW and the requirements of OAC rule 3745-21-25.</p> <p>See B.3., B.4., B.5., B.6., B.7., B.9., B.10., B.11., B.12., B.13. and B.14.</p> <p>The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM emissions from this air contaminant source since the controlled PTE is less than 10 TPY, taking into account the voluntary restriction per OAC rule 3745-31-05(E).</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(E)	See c)(1).
c.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack(s) serving these EUs shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
d.	OAC rule 3745-17-11(B)(1)	PE from each EU shall not exceed 2.58 lbs./hr., the rate allowed by Table 1 to OAC rule 3745-17-11. See c)(1).
e.	OAC rule 3745-21-25	VOC emissions shall not exceed the applicable VOC control requirements specified in OAC rule 3745-21-25(D) including the work practice standards in Tables 1. See B.3., B.4., B.5., B.6., B.7., B.8., B.9., B.10., B.11., B.12., B.13. and B.14.
f.	40 CFR Part 63, Subpart WWWW	Organic HAP emissions shall not exceed the applicable standards specified in 40 CFR §63.5805.
g.	40 CFR §63.1 - §63.15	Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63 shows which parts of the General Provisions in 40 CFR 63.1 – 63.15 apply.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

- (1) The permittee shall operate the dust control system (e.g. WF#1) to control PE whenever this EU is in operation.

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

- (2) OAC rule 3745-21-25 work practice standards:
 - a. See B.6.

[Authority for term: OAC rule 3745-21-25 and OAC rule 3745-77-07(A)(1)]
- (3) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935).

[Authority for term: 40 CFR Part 63, Subpart WWWW and OAC rule 3745-77-07(A)(1)]
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain daily records that document any time periods when the dust control system was not in service when the EU was in operation.

[Authority for term: OAC rule 3745-31-05(E) and OAC rule 3745-77-07(C)(1)]
 - (2) The permittee shall perform weekly checks, when any of the EUs is in operation and when the weather conditions allow, for any visible PE from the stack(s) serving these EUs. The presence or absence of any VE shall be noted in an operations log. If VE are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any VE incident; and
 - e. any corrective actions taken to minimize or eliminate the VE.
[Authority for term: OAC rule 3745-17-07(A)(1) and OAC rule 3745-77-07(C)(1)]
 - (3) If VE are present, a VE incident has occurred. The observer does not have to document the exact start and end times for the VE incident under item d)(2)d above or continue the weekly check until the incident has ended. The observer may indicate that the VE incident was continuous during the observation period (or, if known, continuous during the operation of the EU). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the VE were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the EU continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal VE.

[Authority for term: OAC rule 3745-17-07(A)(1) and OAC rule 3745-77-07(C)(1)]
 - (4) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935).

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

(5) OAC rule 3745-21-25 Continuous Compliance Requirements

- a. See B.9.

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

(6) OAC rule 3745-21-25 Recordkeeping Requirements and Retention Requirements for Records and Reports

- a. See B.10.

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

(7) The permittee shall maintain monthly records of data to estimate the emissions of air pollutants for each of these EUs. For example, the monthly usages of each material type employed, in tons of material, may be multiplied by the appropriate emissions factor, determined from the methods specified in f), or a site-specific emissions factor, to estimate monthly emissions, in tons/month.

[Authority for term: ORC 3745.11 and OAC rule 3745-78-02 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

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

- a. any daily record showing that the dust control system (e.g. (WF#1)) for this EU was not in service when the EU was in operation;
- b. all days during which any visible PE were observed from the stack serving this EU; and
- c. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the Ohio EPA NEDO) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-31-05(E), OAC rule 3745-17-07(A)(1) and OAC rule 3745-77-07(C)(1)]

(2) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935).

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

(3) The permittee shall submit semiannual reports for each 6-month reporting period, as required in OAC rule 3745-21-25 and shall include the following information for each EU and/or group of EUs that employ the same VOC emission limit and the same compliance option:

- a. the EU identification number(s) (e.g. P010);
- b. a statement of the compliance status of the applicable work practice standards in Table 1 to OAC rule 3745-21-25;

- c. if applicable, information regarding corrective actions, required by paragraph (Q)(3)(f) of OAC rule 3745-21-25, for deviations of the applicable work practice standards; and
- d. other information required by OAC rule 3745-21-25(Q). See B.12.

See B.12.a) through c) for the semiannual report due dates.

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

- (4) The permittee shall report estimates of the air pollutant emissions, in TPY, for the 12-month period ending on December 31 for the EU in the annual fee emissions report.

[Authority for term: ORC 3745.11 and OAC rule 3745-78-02 and OAC rule 3745-77-07(C)(1)]

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

[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. Emission Limitation:

Visible PE from the stack(s) serving these EUs shall not exceed 20% opacity as a 6-minute average, except as specified by the rule.

Applicable Compliance Method:

If required, compliance with the stack visible PE limitation shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A-4, Method 9.

[Authority for term: OAC rule 3745-17-03(B)(1)(a) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

The PE rate shall not exceed 2.58 lbs./hr. from any of the EUs specified in C.6.

Applicable Compliance Method:

- i. The maximum, uncontrolled hourly emissions may be estimated by the following equation:

$$PE_{\text{UNCTRL}} = \text{lbs. solids/hr.} \times EF$$

where:

$PE_{UNCTRL} = PM_{UNCTRL\ 10} = PM_{UNCTRL\ 2.5}$ = the uncontrolled rate of PE, and the uncontrolled emissions of PM_{10} and $PM_{2.5}$, which were estimated to be 3.08 lbs. $PE_{UNCTRL}/hr.$, 3.08 lbs. $PM_{UNCTRL\ 10}/hr.$ and 3.08 lbs. $PM_{UNCTRL\ 2.5}/hr.$, respectively;

lbs. solids/hr. = maximum solid input to each mixer, which is 308 lbs. solids/hr. as noted in the application(s) for PTI P0121642; and

$EF = 0.01$ lb. $PE_{UNCTRL}/lb.$ solids = 0.01 lb. $PM_{10\ UNCTRL}/lb.$ solids = 0.01 lb. $PM_{2.5\ UNCTRL}/lb.$ solids as adapted from 20 lbs. PE_{UNCTRL}/ton pigment solids for paint manufacture in U.S. EPA AP42 Chap. 6.4 (05/1983) for Paint & Varnish Manufacturing.

- ii. The maximum, controlled hourly emissions may be estimated by the following equation:

$$PE\ (lb./hr.) = PE_{UNCTRL} \times Control_{Overall}$$

where:

$PE\ (lb./hr.) = PM_{10}\ (lb./hr.) = PM_{2.5}\ (lb./hr.)$ = the controlled rate of PE, and the controlled emissions of PM_{10} and $PM_{2.5}$, which were estimated to be 0.16 lb. $PE/hr.$, 0.16 lb. $PM_{10}/hr.$ and 0.16 lb. $PM_{2.5}/hr.$, respectively.

$$Control_{Overall} = Capture\ Efficiency \times CE/100$$

$Control_{Overall}$ = overall efficiency of the capture-control system to control pollutant emissions, which was estimated to be 94.97% for the PE rate and emissions of PM_{10} and $PM_{2.5}$;

Capture Efficiency = the efficiency of the system to capture the uncontrolled air pollutant emissions, which is 95% as stated in the application(s) for PTI P0121642; and

CE = the efficiency of the dust control device to control the captured air pollutant emissions, which is 99.97% per the filter fabric manufacturer's specification for captured $PM_{2.5}$ emissions when the exhaust flow was 2000 acfm at 1.34 inches W.G. pressure drop for the proposed high capacity, HEPA filters as stated in the application(s) for PTI P0121642.

If required, compliance with the allowable particulate emission limitations shall be demonstrated in accordance with the following method(s): Methods 1 through 4 and Method 5 of 40 CFR Part 60, Appendices A1 through A3.

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

- c. Emission Limitation and/or Control Requirements:

Organic HAP emissions shall not exceed the applicable standards specified in 40 CFR §63.5805 including complying with the work practice standard in Table 4 of 40 CFR 63 Subpart WWWW.



Applicable Compliance Method:

The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart WWWW. See 40 CFR Part 63 Subpart WWWW (40 CFR 63.5780-63.5935).

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

d. Emission Limitation and/or Control Requirements:

Table 1 to OAC rule 3745-21-25 Applicable work practice standards

Applicable Compliance Method:

Compliance shall be demonstrated based upon the work practice requirements specified in d)(5) and the record keeping requirements specified in d)(6).

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

g) **Miscellaneous Requirements**

- (1) The annual PTE air pollutant emissions from each of EUs P009, P014 and P015 were estimated to be the following: 15.77 tons VOC emissions, as styrene, a HAP; and 0.127 ton PM₁₀ and 0.127 ton PM_{2.5}. The potential PE estimates consider the use of air pollution control system(s) required by OAC rules 3745-17-11(B)(1) and 3745-31-05(A)(3).
- (2) For the 12-month period ending on December 31 for the EUs in the annual fee emissions report, the actual, annual OC and VOC emissions from any of the EUs specified in C.5. may be estimated by the following equation(s):

$$\text{OC-VOC(ton/yr.)} = \{\sum_{i=1 \dots n} (\text{lbs. resin}_i/\text{month} \times \text{lb. styrene/lb. resin}_i)$$

$$+ \text{lbs. styrene monomer/month} \times \text{EF}\} \times \text{ton OC-VOC/2000 lbs. OC-VOC}$$

where:

OC-VOC(ton/yr.) = the estimated OC-VOC emissions, in ton/yr;

lbs. resin_i/month = the monthly usages of each resin i, in lbs;

lb. styrene/lb. resin_i = the styrene content of each resin i, as a decimal fraction;

lbs. styrene monomer/month = the monthly usages of styrene monomer, in lbs;

EF = the factor for OC-VOC emissions, which is 0.01 lb. VOC/lb. styrene exhaust derived from a factor of 20 lb. VOC/2000 lbs. acrylic varnish product from U.S. EPA AP42 Chap. 6.4 (05/1983) for Paint & Varnish Manufacturing;

i = a specific resin employed during the month; and

n = total number of resins employed during the month.

A site-specific emission factor and/or alternative calculations may be used if more representative of materials employed and/or site operation(s).

- (3) A review of the safety data sheet for processing Hexion E826 /A100, an epoxy resin type, and process operations determined that negligible, if any, VOC emissions would be generated from use at a mixer.

7. EU Group - Liquid Composite Molding: P016, P017 and P018

EU ID	Operations, Property and/or Equipment Description
P016	Compression mold machine A using liquid compound for composite plastics production.
P017	Compression mold machine B using liquid compound for composite plastics production.
P018	Compression mold machine C using liquid compound for composite plastics production.

- 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)	For the VOC emissions, the requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW and the requirements of OAC rule 3745-21-25. See B.3., B.4., B.5., B.6., B.7., B.8., B.9., B.10., B.11., B.12., B.13. and B.14.
b.	OAC rule 3745-21-25	VOC emissions shall not exceed the applicable VOC control requirements specified in OAC rule 3745-21-25(D) including the work practice standards in Tables 1. See B.3., B.4., B.5., B.6., B.7., B.8., B.9., B.10., B.11., B.12., B.13. and B.14.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	40 CFR Part 63, Subpart WWWW	Organic HAP emissions shall not exceed the applicable standards specified in 40 CFR §63.5805 including the work practice standards in Tables 4 of Subpart WWWW. See b)(2)a.
d.	40 CFR §63.1 - §63.15	Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63 shows which parts of the General Provisions in 40 CFR 63.1 – 63.15 apply.

(2) Additional Terms and Conditions

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

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935)
[Authority for term: 40 CFR Part 63, Subpart WWWW and OAC rule 3745-77-07(C)(1)]
- (2) OAC rule 3745-21-25 Continuous Compliance Requirements
 - a. See B.9.

[Authority for term: OAC rule 3745-21-25 and OAC rule 3745-77-07(C)(1)]
- (3) OAC rule 3745-21-25 Recordkeeping Requirements and Retention Requirements for Records and Reports
 - a. See B.10.

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

- (4) The permittee shall maintain monthly records of data to estimate the emissions of air pollutants for this EU. For example, the monthly usages of each material type employed, in tons of material, may be multiplied by the appropriate emissions factor, determined from the methods specified in f), or a site-specific emissions factor, to estimate monthly emissions, in tons/month.

[Authority for term: ORC 3745.11, OAC rule 3745-78-02 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935).

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

- (2) The permittee shall submit semiannual reports for each 6-month reporting period, as required in OAC rule 3745-21-25 and shall include the following information for each EU and/or group of EUs that employ the same VOC emission limit and the same compliance option:

- a. the EU identification number(s) (e.g. P016);
- b. a statement of the compliance status of the applicable work practice standards in Table 1 to OAC rule 3745-21-25;
- c. if applicable, information regarding corrective actions, required by paragraph (Q)(3)(f) of OAC rule 3745-21-25, for deviations of the applicable work practice standards; and
- d. other information required by OAC rule 3745-21-25(Q). See B.12.

See B.12.a) through c) for the semiannual report due dates.

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

- (3) The permittee shall report estimates of the air pollutant emissions, in TPY, for the 12-month period ending on December 31 for the EU in the annual fee emissions report.

[Authority for term: ORC 3745.11, OAC rule 3745-78-02 and OAC rule 3745-77-07(C)(1)]

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

[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. Emission Limitation and/or Control Requirements:

Organic HAP emissions shall not exceed the applicable standards specified in 40 CFR §63.5805 including complying with the work practice standard in Table 4 of 40 CFR 63 Subpart WWWW.

Applicable Compliance Method:

The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart WWWW. See 40 CFR Part 63 Subpart WWWW (40 CFR 63.5780-63.5935).

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

b. Emission Limitation and/or Control Requirements:

Table 1 to OAC rule 3745-21-25 Applicable work practice standards

Applicable Compliance Method:

Compliance shall be demonstrated based upon the work practice requirements specified in d)(2) and the record keeping requirements specified in d)(3).

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

g) **Miscellaneous Requirements**

(1) The annual PTE air pollutant emissions from each of EUs P016, P017 and P018 were estimated to be the following: 16.38 tons VOC emissions, as styrene, a HAP.

(2) For the 12-month period ending on December 31 for the EUs in the annual fee emissions report, the actual, annual OC and VOC emissions may be estimated by the following equation(s):

$$\text{OC-VOC(ton/yr.)} = \{\sum_{i=1...n} \text{lbs. resin paste}_i / \text{month} \times (\text{EF}_{\text{POUR } i} + \text{EF}_{\text{SPREAD } i})\} \times \text{ton OC-VOC/2000 lbs. OC-VOC}$$

where:

lbs. resin paste/month = monthly usage of resin paste “i”, in lbs;

EF_{POUR} = poured paste emission factor for liquid compound molding, in lb. styrene/lb. resin paste = $(0.0022 \times \text{styrene content} + 0.0008)$ lb. VOC/lb. resin paste from “Estimating Emission Factors from Open Molding and Other Composite Processes” (American National Standard, 2011);

Styrene content = styrene content, as a decimal fraction, of resin paste “i”;

EF_{SPREAD} = spread paste emission factor for liquid compound molding, in lb. styrene/lb. resin paste = $(0.0072 \times \text{styrene content} + 0.0008)$ lb. VOC/lb. resin paste from “Estimating Emission Factors from Open Molding and Other Composite Processes” (American National Standard, 2011);

i = a specific resin paste employed during the month; and

n = total number of resin pastes employed during the month.

A site-specific emission factor and/or alternative calculations may be used if more representative of materials employed and/or site operation(s).

8. EU Group - Pultrusion Lines: P001, P002, P003, P004, P005, P006, P007, P008 and P012

EU ID	Operations, Property and/or Equipment Description
P001	Pultrusion line no. 1 for composite plastics production with a cut-off saw and a baghouse (DC #1) to control particulate emissions.
P002	Pultrusion line no. 2 for composite plastics production with a cut-off saw and a baghouse (DC #1) to control particulate emissions.
P003	Pultrusion line no. 3 for composite plastics production with a cut-off saw and a baghouse (DC #1) to control particulate emissions.
P004	Pultrusion line no. 4 for composite plastics production with a cut-off saw and a baghouse (DC #1) to control particulate emissions.
P005	Pultrusion line no. 5 for composite plastics production with a cut-off saw and a baghouse (DC #1) to control particulate emissions.
P006	Pultrusion line no. 6 for composite plastics production with a cut-off saw and a baghouse (DC #1) to control particulate emissions.
P007	Pultrusion line no. 7 for composite plastics production with a cut-off saw and a baghouse (DC #1) to control particulate emissions.
P008	Pultrusion line no. 8 for composite plastics production with a cut-off saw and a baghouse (DC #1) to control particulate emissions.
P012	Sheet pultrusion line for composite plastics production with a cut-off saw and a baghouse (DC #1) to control particulate emissions.

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)	<p><u>For EUs P001, P002, P003, P004, P005, P006, and P007:</u></p> <p>The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled PTE is less than 10 TPY.</p> <p>The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from this air contaminant source since the controlled PTE is less than 10 TPY taking into account the voluntary restriction from OAC rule 3745-31-05(E).</p> <p><u>For EU P012:</u></p> <p>The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from this air contaminant source since the controlled PTE is less than 10 TPY, taking into account the voluntary restriction per OAC rule 3745-31-05(E).</p> <p>For the VOC emissions from EU P012, the requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW and compliance with the requirements of OAC rule 3745-21-25.</p>
b.	OAC rule 3745-31-05(E)	See b)(2)a.
c.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack(s) serving these EUs shall not exceed 20% opacity as a 6-minute average each, except as provided by the rule.
d.	OAC rule 3745-17-11(B)(1)	PE shall not exceed the following allowable emission rates allowed by Table 1 to OAC rule 3745-17-11: 2.09 lbs./hr. from P001-P006 and



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		P008 each; 0.551 lb./hr. from P007; and 2.66 lbs./hr. from P012.
e.	OAC rule 3745-21-25	VOC emissions shall not exceed the applicable VOC control requirements specified in OAC rule 3745-21-25(D) including the work practice standards in Table 1. See B.3., B.4., B.5., B.6., B.7., B.8., B.9., B.10., B.11., B.12., B.13. and B.14.
f.	40 CFR Part 63, Subpart WWWW	Organic HAP emissions shall not exceed the applicable standards specified in 40 CFR §63.5805.
g.	40 CFR §63.1 - §63.15	Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63 shows which parts of the General Provisions in 40 CFR 63.1 – 63.15 apply.

(2) Additional Terms and Conditions

- a. The emissions from the EUs listed above shall be vented to the baghouse when one or more of the EUs are in operation. EUs P001 - P007, P008, P011 and P012 share a common baghouse.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1 to 5 inches of water.

[Authority for term: OAC rule 3745-31-05(E), OAC rule 3745-17-11(B)(1) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled EU(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure



drop across the baghouse on a weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

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

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

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

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

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA NEDO. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with



the allowable PE rate for the controlled EU(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-31-05(E), OAC rule 3745-17-11(B)(1) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall maintain daily records that document any time periods when the dust control system was not in service when any of the EUs listed in C.7. was in operation.

[Authority for term: OAC rule 3745-31-05(E), OAC rule 3745-17-11(B)(1) and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall perform weekly checks, when the EU is in operation and when the weather conditions allow, for any visible PE from the stack(s) serving these EU. The presence or absence of any VE shall be noted in an operations log. If VE are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any VE incident; and
- e. any corrective actions taken to minimize or eliminate the VE.

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

- (5) If VE are present, a VE incident has occurred. The observer does not have to document the exact start and end times for the VE incident under item d)(4)d above or continue the weekly check until the incident has ended. The observer may indicate that the VE incident was continuous during the observation period (or, if known, continuous during the operation of the EU). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the VE were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the EU continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal VE.

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

- (6) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935)

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

- (7) OAC rule 3745-21-25 Continuous Compliance Requirements

- a. See B.9.

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

- (8) OAC rule 3745-21-25 Recordkeeping Requirements and Retention Requirements for Records and Reports

a. See B.10.

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

- (9) The permittee shall maintain monthly records of data to estimate the emissions of air pollutants for these EUs. For example, the monthly usages of each material type employed, in tons of material, may be multiplied by the appropriate emissions factor, determined from the methods specified in f), or a site-specific emissions factor, to estimate monthly emissions, in tons/month.

[Authority for term: ORC 3745.11, OAC rule 3745-78-02 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935)

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

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

- a. any daily record showing that the dust control system (e.g. DC #1) for this EU was not in service when the EU was in operation;
- b. all days during which any visible PE were observed from the stack serving this EU; and
- c. any corrective actions taken to minimize or eliminate the visible PE.

These reports shall be submitted to the Director (the Ohio EPA NEDO) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-31-05(E), OAC rule 3745-17-07(A)(1) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit semiannual reports for each 6-month reporting period, as required in OAC rule 3745-21-25 and shall include the following information for each EU and/or group of EUs that employ the same VOC emission limit and the same compliance option:

- a. the EU identification number(s) (e.g. P001);
- b. the applicable VOC emission limit, as a rolling 12-month average for each material and application type as listed in Table 2 of OAC rule 3745-21-25;
- c. a statement of the compliance status with the applicable VOC emission limit;

- d. a statement of the compliance status of the applicable work practice standards in Table 1 to OAC rule 3745-21-25 and the applicable VOC emission limit;
- e. a statement of the compliance status of the applicable VOC emission limit as listed in Table 2 to OAC rule 3745-21-25;
- f. if applicable, information regarding corrective actions, required by paragraph (Q)(3)(f) of OAC rule 3745-21-25, for deviations of the applicable work practice standards; and
- g. other information required by OAC rule 3745-21-25(Q). See B.12.

See B.12.a) through c) for the semiannual report due dates.

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

- (4) The permittee shall report estimates of the air pollutant emissions, in TPY, for the 12-month period ending on December 31 for the EU in the annual fee emissions report.

[Authority for term: ORC 3745.11, OAC rule 3745-78-02 and OAC rule 3745-77-07(C)(1)]

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

[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. **Emission Limitation:**

Visible PE from the stack(s) serving these EUs shall not exceed 20% opacity as a 6-minute average, except as specified by the rule.

Applicable Compliance Method:

If required, compliance with the stack visible PE limitation shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A-4, Method 9.

[Authority for term: OAC rule 3745-17-03(B)(1)(a) and OAC rule 3745-77-07(C)(1)]

- b. **Emission Limitation:**

The PE rate shall not exceed 2.09 lbs./hr. from P001-P006 and P008 each.

The PE rate shall not exceed 0.551 lb./hr. from P007.

The PE rate shall not exceed 2.66 lbs./hr. from P012.

Applicable Compliance Method:

- i. The maximum, uncontrolled hourly emissions may be estimated by the following equation:

$$PE_{UNCTRL} = \text{cycles/hr.} \times EF$$

where:

$PE_{UNCTRL} = PM_{UNCTRL\ 10} = PM_{UNCTRL\ 2.5}$ = the uncontrolled rate of PE, and the uncontrolled emissions of PM_{10} and $PM_{2.5}$, which were estimated to be 0.5508 lb. PE_{UNCTRL} /hr.; 0.5508 lb. $PM_{UNCTRL\ 10}$ /hr. and 0.5508 lb. $PM_{UNCTRL\ 2.5}$ /hr. for P001-P008 and P012 each.

cycles/hr. = maximum number of cycles per hour as noted in the application(s) for PTI P0121642.

EF = emission factor, which is 0.0648 lb. dust generated per cycle from an in-house study at Iten Industries, Plant 3 (0204010442) as noted in the application(s) for PTI P0121642.

- ii. The maximum, controlled hourly emissions may be estimated by the following equation:

$$PE\ (\text{lb./hr.}) = PE_{UNCTRL} \times \text{Control}_{Overall}$$

where:

$PE\ (\text{lb./hr.}) = PM_{10}\ (\text{lb./hr.}) = PM_{2.5}\ (\text{lb./hr.})$ = the controlled rate of PE, and the controlled emissions of PM_{10} and $PM_{2.5}$, which were estimated to be 0.029 lb. PE /hr., 0.029 lb. PM_{10} /hr. and 0.029 lb. $PM_{2.5}$ /hr., respectively.

$$\text{Control}_{Overall} = \text{Capture Efficiency} \times CE/100$$

$\text{Control}_{Overall}$ = overall efficiency of the capture-control system to control pollutant emissions, which was estimated to be 94.97% for the PE rate and emissions of PM_{10} and $PM_{2.5}$;

Capture Efficiency = the efficiency of the system to capture the uncontrolled air pollutant emissions, which is 95% as stated in the application(s) for PTI P0121642; and

CE = the efficiency of the dust control device to control the captured air pollutant emissions, which is 99.99819% for captured $PM_{2.5}$ emissions and a mean outlet concentration of 0.0001146 grain $PM_{2.5}$ /dscf derived from a verification (performance) test of the Clear Edge Filtration/SF PESN 1630 SST filter fabric.

If required, compliance with the allowable PE limitation shall be demonstrated in accordance with the following method(s):

Methods 1 through 4 and Method 5 of 40 CFR Part 60, Appendices A1 through A3.

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

c. Emission Limitation and/or Control Requirements:

Organic HAP emissions shall not exceed the applicable standards specified in 40 CFR §63.5805 including complying with the work practice standard in Table 4 of 40 CFR 63 Subpart WWWW

Applicable Compliance Method:

The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart WWWW. See 40 CFR Part 63 Subpart WWWW (40 CFR 63.5780-63.5935).

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

d. Emission Limitation and/or Control Requirements:

The applicable VOC emissions limits for open molding and other sources with VOC emissions less than the threshold of 100 TPY of VOC in Table 2 to OAC rule 3745-21-25 which is: a reduction of total organic HAP emissions by at least 60 percent as a rolling, 12-month average for a pultrusion operation⁶.

⁶Pultrusion machines that produce parts that meet the following criteria: 1,000 or more reinforcements or the glass equivalent of 1,000 ends of 113 yield roving or more; and have a cross-sectional area of 60 square inches or more are not subject to this requirement. Their requirement is the work practice of air flow management which is described in Table 1 of OAC rule 3745-21-25.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the continuous compliance requirements specified in d)(7) and the record keeping requirements specified in d)(8).

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

e. Emission Limitation and/or Control Requirements:

Table 1 to OAC rule 3745-21-25 Applicable work practice standards

Applicable Compliance Method:

Compliance shall be demonstrated based upon the work practice requirements specified in d)(7) and the record keeping requirements specified in d)(8).

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

g) **Miscellaneous Requirements**

- (1) The annual PTE air pollutant emissions were estimated to be the following: 6.18 tons VOC from P001-P006 and P008 each; 0.75 ton VOC from P007; and 15.77 tons VOC from P012; and 0.127

ton PM₁₀ and 0.127 ton PM_{2.5} from P001-P008 and P012 each. The potential PE estimates consider the use of air pollution control system(s) required by OAC rule 3745-31-05(A)(3).

- (2) For the 12-month period ending on December 31 for the EUs in the annual fee emissions report, the actual, annual OC and VOC emissions may be estimated by the following equation(s):

$$\text{OC-VOC(TPY)} = \{\sum_{i=1 \dots n} \text{lbs. resin mix}_i / \text{month} \times \text{styrene content}\} \times \text{EF} \times (1 - \text{CE}) \times \text{ton OC-VOC} / 2000 \text{ lbs. OC-VOC}$$

where:

OC-VOC(TPY) = the estimated OC-VOC emissions, in TPY;

lbs. resin mix_i/month = the monthly usage of each resin mix “i”, in lbs;

styrene content = the styrene content of each resin mix “i”, as a decimal fraction, in lb. styrene/lb. resin mix;

i = a specific resin mix employed during the month;

n = total number of resin mixes employed during the month;

EF = 0.04 lb. VOC emissions/lb. available VOC monomer resin applied from a continuous lamination operation which is assumed to be similar to a pultrusion operation. U.S. EPA, AP-42, Fifth Edition, Volume I, Chapter 4: Evaporation Loss Sources, Section 4.4, Table 4.4-2. Emission Factors for Uncontrolled Polyester Resin Production Fabrication Processes, (02/2007); and

CE = Control efficiency, 0.60 by weight, with the use of partial enclosures.

A site-specific emission factor and/or alternative calculations may be used if more representative of materials employed and/or site operation(s).

- (3) A review of the safety data sheet for processing Hexion E826 /A100, an epoxy resin type, and process operations determined that negligible, if any, VOC emissions would be generated from use at a pultrusion line.