State of Ohio Environmental Protection Agency

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

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

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

03/31/00

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

03-86-01-0104
Allied Moulded Products, Inc.
Andrew M. Feyes
222 N. Union Street
P.O. Box 587
Bryan, OH 43506

Dear Andrew M. Feyes:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Northwest District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions or comments concerning this draft Title V permit, please contact Northwest District Office.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA (electronic)
Jim Orlemann, DAPC Engineering
Michael Ahern, DAPC PMU
Northwest District Office
Indiana
Michigan

Ohio EPA
State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 03/31/00

Effective Date:

Expiration Date:

The duration of this permit will be five years.

This document constitutes issuance to:

Allied Moulded Products, Inc.
222 N. Union Street
P.O. BOX 587
Bryan, OH 43506

of a Title V permit for Facility ID: 03-86-01-0104

Emissions Unit ID (Company ID)/
Emissions Unit Activity Description:
P001 (Mixer Asset #48)
Sigma blade mixer for mixing bulk molding compound.

P003 (Mixer Asset #656)
Sigma blade mixer for mixing bulk molding compound.

P004 (Mixer Asset #472)
Sigma blade mixer for mixing bulk molding compound.

P005 (High Shear Blender #6066)
High shear mixer for blending pre-mix slurry.

P006 (Mixer Asset #471)
Sigma blade mixer for mixing bulk molding compound.

P007 (Injection Press #887)
Injection press for molding fabricated products.

P008 (Injection Press #32)
Injection press for molding fabricated products.

P009 (Injection Press #6056)
Injection press for molding fabricated products.

P010 (Compression Press #7)
Compression press for molding fabricated products.

P011 (Compression Press #13)
Compression press for molding fabricated products.

P012 (Compression Press #9)
Compression press for molding fabricated products.

P013 (Compression Press #31)
Compression press for molding fabricated products.

P014 (Injection Press #35)
Injection press for molding fabricated products.

P015 (Injection Press #3401)
Injection press for molding fabricated products.

P016 (Injection Press #3301)
Injection press for molding fabricated products.

P018 (Injection Press #591)
Injection press for molding fabricated products.

P019 (Injection Press #590)
Injection press for molding fabricated products.

P020 (Injection Press #601)
Injection press for molding fabricated products.

P021 (Injection Press #602)
Injection press for molding fabricated products.

P022 (Injection Press #465)
Injection press for molding fabricated products.

P023 (Injection Press #462)
Injection press for molding fabricated products.

P024 (Injection Press #481)
Injection press for molding fabricated products.

P025 (Injection Press #482)
Injection press for molding fabricated products.

P026 (Injection Press #811)
Injection press for molding fabricated products.

P027 (Injection Press #480)
Injection press for molding fabricated products.

P028 (Injection Press #1009)
Injection press for molding fabricated products.

P029 (Injection Press #1073)
Injection press for molding fabricated products.

P030 (Injection Press #1074)
Injection press for molding fabricated products.

P031 (Compression Press #435)
Compression press for molding fabricated products.

P032 (Compression Press #665)
Compression press for molding fabricated products.

P033 (Compression Press #696)
Compression press for molding fabricated products.

P034 (Compression Press #734)
Compression press for molding fabricated products.

P035 (Compression Press #733)
Compression press for molding fabricated products.

P038 (Injection Press #1139)
Injection press for molding fabricated products.

P040 (Injection Press #1141)
Injection press for molding fabricated products.

P042 (Injection Press #1439)
Injection press for molding fabricated products.

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

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

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 352-8461

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

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.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

   i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
   ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.6 below if no deviations occurred during the quarter.
   iii. Written reports, which identify any deviations from the federally enforceable <u>monitoring</u>, <u>recordkeeping</u>, <u>and reporting requirements</u> contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
   iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. 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 CFR 68.215(a), the permittee shall submit either of the following:

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

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

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

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

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. 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.

7. Fees

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

8. Marketable Permit Programs

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

9. Reasonably Anticipated Operating Scenarios

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

10. Reopening for Cause

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

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen 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.

11. Federal and State Enforceability

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

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

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

   i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
   ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
   iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
   iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be

submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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

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

(a) An identification of each term or condition of this permit that is the basis of the certification.
(b) The permittee's current compliance status.
(c) Whether compliance was continuous or intermittent.
(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

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

13. Permit Shield

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

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

14. Operational Flexibility

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

15. Emergencies

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

16. Off Permit Changes

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

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

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

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

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

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

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

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

17. Compliance Method Requirements

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

18. Title VI Provisions

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

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

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

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

B. State Only Enforceable Section

1. 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.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Scheduled Maintenance/Malfunction Reporting

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

4. Permit Transfers

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

5. 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.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

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

natural gas fired space heater #6861 (Z014); natural gas-fired space heater #6862 (Z015); natural gas-fired space heater #6863 (Z016); natural gas-fired space heater #6864 (Z017); natural gas-fired space heater #6865 (Z018); natural gas-fired space heater #6866 (Z019); natural gas-fired space heater #6867 (Z020); and natural gas-fired space heater #6868 (Z021).

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

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Mixer Asset #48 (P001)

Activity Description: Sigma blade mixer for mixing bulk molding compound.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Sigma blade mixer - asset #48, with baghouse	OAC rule 3745-17-11(B)(2)	none (see A.I.2.a.)
	OAC rule 3745-17-07(A)	none (see A.I.2.b.)

2. Additional Terms and Conditions

2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11(B)(2). Also, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Williams County.

2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.c OAC rule 3745-21-07(G) is not applicable because the facility is not located in a "Priority 1" county and the emissions unit was installed prior to February 15, 1972.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Mixer Asset #656 (P003)

Activity Description: Sigma blade mixer for mixing bulk molding compound.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Sigma blade mixer - asset #656, with baghouse	OAC rule 3745-17-11(B)(2)	none (see A.I.2.a.)
	OAC rule 3745-17-07(A)	none (see A.I.2.b.)

2. Additional Terms and Conditions

2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11(B)(2). Also, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Williams County.

2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.c OAC rule 3745-21-07(G) is not applicable because the facility is not located in a "Priority 1" county and the emissions unit was installed prior to February 15, 1972.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Mixer Asset #472 (P004)

Activity Description: Sigma blade mixer for mixing bulk molding compound.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Sigma blade mixer - asset # 472, with baghouse	OAC rule 3745-21-07(G)(2)	8 lbs organic compounds (OC)/hr and 40 lbs OC/day
	OAC rule 3745-31-05 (PTI #03-9409)	0.10 lb particulate emissions (PE)/hr and 0.44 ton PE/yr
		20 percent opacity, as a six-minute average, except as otherwise provided by rule
		7.3 tons OC/yr

2. Additional Terms and Conditions

2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11(B)(2). Also, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Williams County.

2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.c The permittee shall employ a baghouse to control all the PE from this emissions unit.

2.d The permittee does not employ cleanup materials in this emissions unit.

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.

II. Operational Restrictions (continued)

2. The permittee shall implement, at a minimum, the following work practices to minimize OC emissions:

a. the prompt clean up of spills;

b. the prompt repair of leaks in any portion of the material handling process;

c. the covering of open containers whenever practical; and

d. minimizing the duration of time when organic materials are exposed to the air.

III. Monitoring and/or Record Keeping Requirements

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

a. the company identification for each bulk molding compound formulation mixed;

b. the number of pounds of each bulk molding compound formulation mixed;

c. the OC (styrene) content (in percent by, weight) for each bulk molding compound formulation mixed;

d. the total OC emission rate for all bulk molding compounds mixed, in pounds, calculated as follows:

OC emissions (lbs/day) = summation of [(Pi x Si x EF)] for i=1 to n

where:

i = 1, 2, ...n

n = the total number of different types of bulk molding compounds

Pi = the number of pounds per day of bulk molding compound i mixed

Si = the OC (styrene) content (in percent, by weight) for bulk molding compound i mixed

EF = .0125 = volatilization emission factor for styrene* (1.25 percent, by weight, of the total styrene employed)

e. the number of hours the emissions unit was in operation; and

f. the average hourly OC emission rate (d/e), in pounds per hour (average).

* This emission factor is based on information supplied by the permittee.

2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.

3. The permittee shall collect and record the total OC emissions each year for this emissions unit (the annual OC emissions shall be calculated by summing the daily OC emissions from section A.III.1.d for the calendar year).

IV. Reporting Requirements

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

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

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

2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.1 of the terms and conditions of this permit.

3. The permittee shall submit annual reports which summarize the actual annual OC emissions for this emissions unit. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

1.a Emission Limitation:
8 lbs OC/hr and 40 lbs OC/day

Applicable Compliance Method:
Compliance with the hourly and daily OC emission limitations shall be based upon the record keeping specified in section A.III.1 of this permit.

1.b Emission Limitation:
0.10 lb PE/hr

Applicable Compliance Method:
The permittee may demonstrate compliance with the hourly PE limitation of 0.10 pound by using the following formula:

PE (lb/hr) = [P x E x (1 - C)]

where:

P = maximum process weight rate, in lbs/hr (7,450 lbs/hr)

E = 0.0012 = emission factor (0.12 percent, by weight, of the amount of solids mixed)*

C = operating control efficiency of the baghouse (98.9 percent)

* emission factor is based on a company study of the dust collected in the mix room

If required, the permittee shall demonstrate compliance with the above PE limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(10).

1.c Emission Limitation:
0.44 ton PE/yr

Applicable Compliance Method:
The ton/yr limitation was developed by multiplying the 0.10 lb PE/hr limitation by the maximum operating schedule of 8,760, and dividing by 2,000. Therefore, provided that compliance with the hourly PE limitation is maintained, compliance with the annual PE limitation will be assumed.

V. Testing Requirements (continued)

1.d Emission Limitation:
20 percent opacity, as a six-minute average, except as otherwise provided by rule

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance in accordance with 40 CFR 60, Appendix A, Method 9.

1.e Emission Limitation:
7.3 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC emission limitation shall be based upon the record keeping specified in sections A.III.1 and 3 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the resin materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Sigma blade mixer - asset # 472, with baghouse	none	none

2. Additional Terms and Conditions

2.a This emissions unit was installed prior to May, 1986. Therefore, this emissions unit is not subject to Ohio EPA's "Air Toxic Policy."

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: High Shear Blender #6066 (P005)

Activity Description: High shear mixer for blending pre-mix slurry.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
high shear blender - asset #6066, with baghouse	OAC rule 3745-21-07(G)(2)	8 lbs organic compounds (OC)/hr and 40 lbs OC/day
	OAC rule 3745-31-05 (PTI #03-9409)	0.10 lb particulate emissions (PE)/hr and 0.44 ton PE/yr
		20 percent opacity, as a six-minute average, except as otherwise provided by rule
		7.3 tons OC/yr

2. Additional Terms and Conditions

2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11(B)(2). Also, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Williams County.

2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.c The permittee shall employ a baghouse to control the PE from this emissions unit.

2.d The permittee does not employ cleanup materials in this emissions unit.

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.

II. Operational Restrictions (continued)

2. The permittee shall implement, at a minimum, the following work practices to minimize OC emissions:

a. the prompt clean up of spills;

b. the prompt repair of leaks in any portion of the material handling process;

c. the covering of open containers whenever practical; and

d. minimizing the duration of time when organic materials are exposed to the air.

III. Monitoring and/or Record Keeping Requirements

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

a. the company identification for each bulk molding compound formulation mixed;

b. the number of pounds of each bulk molding compound formulation mixed;

c. the OC (styrene) content (in percent by, weight) for each bulk molding compound formulation mixed;

d. the total OC emission rate for all bulk molding compounds mixed, in pounds, calculated as follows:

OC emissions (lbs/day) = summation of [(Pi x Si x EF)] for i=1 to n

where:

i = 1, 2, ...n

n = the total number of different types of bulk molding compounds

Pi = the number of pounds per day of bulk molding compound i mixed

Si = the OC (styrene) content (in percent, by weight) for bulk molding compound i mixed

EF = .0125 = volatilization emission factor for styrene* (1.25 percent, by weight, of the total styrene employed)

e. the number of hours the emissions unit was in operation; and

f. the average hourly OC emission rate (d/e), in pounds per hour (average).

* This emission factor is based on information supplied by the permittee.

2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.

3. The permittee shall collect and record the total OC emissions each year for this emissions unit (the annual OC emissions shall be calculated by summing the daily OC emissions from section A.III.1.d for the calendar year).

IV. Reporting Requirements

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

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

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

2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.1 of the terms and conditions of this permit.

3. The permittee shall submit annual reports which summarize the actual annual OC emissions for this emissions unit. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

1.a Emission Limitation:
8 lbs OC/hr and 40 lbs OC/day

Applicable Compliance Method:
Compliance with the hourly and daily OC emission limitations shall be based upon the record keeping specified in section A.III.1 of this permit.

1.b Emission Limitation:
0.10 lb PE/hr

Applicable Compliance Method:
The permittee may demonstrate compliance with the hourly PE limitation of 0.10 pound by using the following formula:

PE (lb/hr) = [P x E x (1 - C)]

where:

P = maximum process weight rate, in lbs/hr (7,450 lbs/hr)

E = 0.0012 = emission factor (0.12 percent, by weight, of the amount of solids mixed)*

C = operating control efficiency of the baghouse (98.9 percent)

* emission factor is based on a company study of the dust collected in the mix room

If required, the permittee shall demonstrate compliance with the above PE limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(10).

1.c Emission Limitation:
0.44 ton PE/yr

Applicable Compliance Method:
The ton/yr limitation was developed by multiplying the 0.10 lb PE/hr limitation by the maximum operating schedule of 8,760, and dividing by 2,000. Therefore, provided that compliance with the hourly PE limitation is maintained, compliance with the annual PE limitation will be assumed.

V. Testing Requirements (continued)

1.d Emission Limitation:
20 percent opacity, as a six-minute average, except as otherwise provided by rule

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance in accordance with 40 CFR 60, Appendix A, Method 9.

1.e Emission Limitation:
7.3 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC emission limitation shall be based upon the record keeping specified in sections A.III.1 and 3 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the resin materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
high shear blender - asset #6066, with baghouse	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-9409 issued on April 3, 1996: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. The permit to install for this emissions unit (P005) was evaluated based on the actual materials (bulk mold compounds and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m3): 213

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4,498

MAGLC (ug/m3): 5,071

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

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (bulk mold compounds or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy;" and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Mixer Asset #471 (P006)

Activity Description: Sigma blade mixer for mixing bulk molding compound.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Sigma blade mixer - asset # 471, with baghouse	OAC rule 3745-21-07(G)(2)	8 lbs organic compounds (OC)/hr and 40 lbs OC/day
	OAC rule 3745-31-05 (PTI #03-9409)	0.10 lb particulate emissions (PE)/hr and 0.44 ton PE/yr
		20 percent opacity, as a six-minute average, except as otherwise provided by rule
		7.3 tons OC/yr

2. Additional Terms and Conditions

2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11(B)(2). Also, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Williams County.

2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.c The permittee shall employ a baghouse to control all the PE from this emissions unit.

2.d The permittee does not employ cleanup materials in this emissions unit.

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.

II. Operational Restrictions (continued)

2. The permittee shall implement, at a minimum, the following work practices to minimize OC emissions:

a. the prompt clean up of spills;

b. the prompt repair of leaks in any portion of the material handling process;

c. the covering of open containers whenever practical; and

d. minimizing the duration of time when organic materials are exposed to the air.

III. Monitoring and/or Record Keeping Requirements

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

a. the company identification for each bulk molding compound formulation mixed;

b. the number of pounds of each bulk molding compound formulation mixed;

c. the OC (styrene) content (in percent by, weight) for each bulk molding compound formulation mixed;

d. the total OC emission rate for all bulk molding compounds mixed, in pounds, calculated as follows:

OC emissions (lbs/day) = summation of [(Pi x Si x EF)] for i=1 to n

where:

i = 1, 2, ...n

n = the total number of different types of bulk molding compounds

Pi = the number of pounds per day of bulk molding compound i mixed

Si = the OC (styrene) content (in percent, by weight) for bulk molding compound i mixed

EF = .0125 = volatilization emission factor for styrene* (1.25 percent, by weight, of the total styrene employed)

e. the number of hours the emissions unit was in operation; and

f. the average hourly OC emission rate (d/e), in pounds per hour (average).

* This emission factor is based on information supplied by the permittee.

2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.

3. The permittee shall collect and record the total OC emissions each year for this emissions unit (the annual OC emissions shall be calculated by summing the daily OC emissions from section A.III.1.d for the calendar year).

IV. Reporting Requirements

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

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

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

2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.1 of the terms and conditions of this permit.

3. The permittee shall submit annual reports which summarize the actual annual OC emissions for this emissions unit. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

1.a Emission Limitation:
8 lbs OC/hr and 40 lbs OC/day

Applicable Compliance Method:
Compliance with the hourly and daily OC emission limitations shall be based upon the record keeping specified in section A.III.1 of this permit.

1.b Emission Limitation:
0.10 lb PE/hr

Applicable Compliance Method:
The permittee may demonstrate compliance with the hourly PE limitation of 0.10 pound by using the following formula:

PE (lb/hr) = [P x E x (1 - C)]

where:

P = maximum process weight rate, in lbs/hr (7,450 lbs/hr)

E = 0.0012 = emission factor (0.12 percent, by weight, of the amount of solids mixed)*

C = operating control efficiency of the baghouse (98.9 percent)

* emission factor is based on a company study of the dust collected in the mix room

If required, the permittee shall demonstrate compliance with the above PE limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(10).

1.c Emission Limitation:
0.44 ton PE/yr

Applicable Compliance Method:
The ton/yr limitation was developed by multiplying the 0.10 lb PE/hr limitation by the maximum operating schedule of 8,760, and dividing by 2,000. Therefore, provided that compliance with the hourly PE limitation is maintained, compliance with the annual PE limitation will be assumed.

V. Testing Requirements (continued)

1.d Emission Limitation:
20 percent opacity, as a six-minute average, except as otherwise provided by rule

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance in accordance with 40 CFR 60, Appendix A, Method 9.

1.e Emission Limitation:
7.3 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC emission limitation shall be based upon the record keeping specified in sections A.III.1 and 3 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the resin materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Sigma blade mixer - asset # 472, with baghouse	none	none

2. Additional Terms and Conditions

2.a This emissions unit was installed prior to May, 1986. Therefore, this emissions unit is not subject to Ohio EPA's "Air Toxic Policy."

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Injection Press #887 (P007)

Activity Description: Injection press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #887	OAC rule 3745-31-05 (PTI #03-9409)	0.81 lb organic compounds (OC)/hr and 3.55 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.81 lb and 3.55 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.81 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 650 pounds per hour; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
3.55 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #887	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-9409 issued on April 3, 1996: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. The permit to install for this emissions unit (P007) was evaluated based on the actual materials (bulk mold compounds and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m3): 213

Maximum Hourly Emission Rate (lbs/hr): 12.5 *

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4,837 **

MAGLC (ug/m3): 5,071

* This represents the sum of the maximum hourly styrene emission rates for the following emissions units: P007, P009, P015, P016, P020, P021, P026, P028, P029, P030, P032, P033, P034, P035, P038 and P040.

** This represents the predicted concentration based on the maximum hourly styrene emission rate of 12.5 lbs/hr.

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

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (bulk mold compounds or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Injection Press #32 (P008)

Activity Description: Injection press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #32	OAC rule 3745-31-05 (PTI #03-9409)	0.97 lb organic compounds (OC)/hr and 4.25 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.97 lb and 4.25 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.97 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 775 pounds per hour; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
4.25 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #32	none	none

2. Additional Terms and Conditions

2.a This emissions unit was installed prior to May, 1986. Therefore, this emissions unit is not subject to Ohio EPA's "Air Toxic Policy."

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Injection Press #6056 (P009)

Activity Description: Injection press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #6056	OAC rule 3745-31-05 (PTI #03-9409)	0.97 lb organic compounds (OC)/hr and 4.25 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.97 lb and 4.25 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.97 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 775 pounds per hour; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
4.25 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #6056	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-9409 issued on April 3, 1996: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. The permit to install for this emissions unit (P009) was evaluated based on the actual materials (bulk mold compounds and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m3): 213

Maximum Hourly Emission Rate (lbs/hr): 12.5 *

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4,837 **

MAGLC (ug/m3): 5,071

* This represents the sum of the maximum hourly styrene emission rates for the following emissions units: P007, P009, P015, P016, P020, P021, P026, P028, P029, P030, P032, P033, P034, P035, P038 and P040.

** This represents the predicted concentration based on the maximum hourly styrene emission rate of 12.5 lbs/hr.

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

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (bulk mold compounds or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy;" and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Compression Press #7 (P010)

Activity Description: Compression press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
compression press - asset #7	none	See A.I.2.a.

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit and the emissions unit was installed prior to February 15, 1972. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Compression Press #13 (P011)

Activity Description: Compression press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
compression press - asset #13	none	See A.I.2.a.

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit and the emissions unit was installed prior to February 15, 1972. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Compression Press #9 (P012)

Activity Description: Compression press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
compression press - asset #9	none	See A.I.2.a.

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit and the emissions unit was installed prior to February 15, 1972. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Compression Press #31 (P013)

Activity Description: Compression press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
compression press - asset #31	none	See A.I.2.a.

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit and the emissions unit was installed prior to February 15, 1972. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Injection Press #35 (P014)

Activity Description: Injection press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #35	none	See A.I.2.a.

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit and the emissions unit was installed prior to February 15, 1972. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Injection Press #3401 (P015)

Activity Description: Injection press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #3401	OAC rule 3745-31-05 (PTI #03-9409)	0.97 lb organic compounds (OC)/hr and 4.25 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.97 lb and 4.25 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.97 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 775 pounds per hour; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
4.25 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #6056	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-9409 issued on April 3, 1996: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. The permit to install for this emissions unit (P009) was evaluated based on the actual materials (bulk mold compounds and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m3): 213

Maximum Hourly Emission Rate (lbs/hr): 12.5 *

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4,837 **

MAGLC (ug/m3): 5,071

* This represents the sum of the maximum hourly styrene emission rates for the following emissions units: P007, P009, P015, P016, P020, P021, P026, P028, P029, P030, P032, P033, P034, P035, P038 and P040.

** This represents the predicted concentration based on the maximum hourly styrene emission rate of 12.5 lbs/hr.

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

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (bulk mold compounds or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy;" and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Injection Press #3301 (P016)

Activity Description: Injection press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #3301	OAC rule 3745-31-05 (PTI #03-9409)	0.97 lb organic compounds (OC)/hr and 4.25 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.97 lb and 4.25 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.97 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 775 pounds per hour; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
4.25 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #6056	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-9409 issued on April 3, 1996: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. The permit to install for this emissions unit (P009) was evaluated based on the actual materials (bulk mold compounds and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m3): 213

Maximum Hourly Emission Rate (lbs/hr): 12.5 *

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4,837 **

MAGLC (ug/m3): 5,071

* This represents the sum of the maximum hourly styrene emission rates for the following emissions units: P007, P009, P015, P016, P020, P021, P026, P028, P029, P030, P032, P033, P034, P035, P038 and P040.

** This represents the predicted concentration based on the maximum hourly styrene emission rate of 12.5 lbs/hr.

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

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (bulk mold compounds or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy;" and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Injection Press #591 (P018)

Activity Description: Injection press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #591	OAC rule 3745-31-05 (PTI #03-9409)	0.97 lb organic compounds (OC)/hr and 4.25 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.97 lb and 4.25 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.97 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 775 pounds per hour; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
4.25 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #32	none	none

2. Additional Terms and Conditions

2.a This emissions unit was installed prior to May, 1986. Therefore, this emissions unit is not subject to Ohio EPA's "Air Toxic Policy."

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Injection Press #590 (P019)

Activity Description: Injection press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #590	OAC rule 3745-31-05 (PTI #03-9409)	0.97 lb organic compounds (OC)/hr and 4.25 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.97 lb and 4.25 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.97 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 775 pounds per hour; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
4.25 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #32	none	none

2. Additional Terms and Conditions

2.a This emissions unit was installed prior to May, 1986. Therefore, this emissions unit is not subject to Ohio EPA's "Air Toxic Policy."

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Injection Press #601 (P020)

Activity Description: Injection press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #601	OAC rule 3745-31-05 (PTI #03-9409)	0.97 lb organic compounds (OC)/hr and 4.25 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.97 lb and 4.25 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.97 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 775 pounds per hour; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
4.25 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #6056	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-9409 issued on April 3, 1996: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. The permit to install for this emissions unit (P009) was evaluated based on the actual materials (bulk mold compounds and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m3): 213

Maximum Hourly Emission Rate (lbs/hr): 12.5 *

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4,837 **

MAGLC (ug/m3): 5,071

* This represents the sum of the maximum hourly styrene emission rates for the following emissions units: P007, P009, P015, P016, P020, P021, P026, P028, P029, P030, P032, P033, P034, P035, P038 and P040.

** This represents the predicted concentration based on the maximum hourly styrene emission rate of 12.5 lbs/hr.

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

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (bulk mold compounds or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy;" and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Injection Press #602 (P021)

Activity Description: Injection press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #602	OAC rule 3745-31-05 (PTI #03-9409)	0.97 lb organic compounds (OC)/hr and 4.25 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.97 lb and 4.25 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.97 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 775 pounds per hour; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
4.25 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #6056	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-9409 issued on April 3, 1996: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. The permit to install for this emissions unit (P009) was evaluated based on the actual materials (bulk mold compounds and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m3): 213

Maximum Hourly Emission Rate (lbs/hr): 12.5 *

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4,837 **

MAGLC (ug/m3): 5,071

* This represents the sum of the maximum hourly styrene emission rates for the following emissions units: P007, P009, P015, P016, P020, P021, P026, P028, P029, P030, P032, P033, P034, P035, P038 and P040.

** This represents the predicted concentration based on the maximum hourly styrene emission rate of 12.5 lbs/hr.

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

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (bulk mold compounds or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy;" and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Injection Press #465 (P022)

Activity Description: Injection press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #465	OAC rule 3745-31-05 (PTI #03-9409)	0.81 lb organic compounds (OC)/hr and 3.55 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.81 lb and 3.55 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.81 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 650 pounds per hour.; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
3.55 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #465	none	none

2. Additional Terms and Conditions

2.a This emissions unit was installed prior to May, 1986. Therefore, this emissions unit is not subject to Ohio EPA's "Air Toxic Policy."

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Injection Press #462 (P023)

Activity Description: Injection press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #462	OAC rule 3745-31-05 (PTI #03-9409)	0.81 lb organic compounds (OC)/hr and 3.55 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.81 lb and 3.55 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.81 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 650 pounds per hour.; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
3.55 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #465	none	none

2. Additional Terms and Conditions

2.a This emissions unit was installed prior to May, 1986. Therefore, this emissions unit is not subject to Ohio EPA's "Air Toxic Policy."

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Injection Press #481 (P024)

Activity Description: Injection press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #481	OAC rule 3745-31-05 (PTI #03-9409)	0.81 lb organic compounds (OC)/hr and 3.55 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.81 lb and 3.55 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.81 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 650 pounds per hour.; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
3.55 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #465	none	none

2. Additional Terms and Conditions

2.a This emissions unit was installed prior to May, 1986. Therefore, this emissions unit is not subject to Ohio EPA's "Air Toxic Policy."

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Injection Press #482 (P025)

Activity Description: Injection press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #482	OAC rule 3745-31-05 (PTI #03-9409)	0.81 lb organic compounds (OC)/hr and 3.55 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.81 lb and 3.55 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.81 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 650 pounds per hour.; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
3.55 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #465	none	none

2. Additional Terms and Conditions

2.a This emissions unit was installed prior to May, 1986. Therefore, this emissions unit is not subject to Ohio EPA's "Air Toxic Policy."

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Injection Press #811 (P026)

Activity Description: Injection press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #811	OAC rule 3745-31-05 (PTI #03-9409)	0.81 lb organic compounds (OC)/hr and 3.55 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.81 lb and 3.55 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.81 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 650 pounds per hour; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
3.55 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #887	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-9409 issued on April 3, 1996: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. The permit to install for this emissions unit (P007) was evaluated based on the actual materials (bulk mold compounds and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m3): 213

Maximum Hourly Emission Rate (lbs/hr): 12.5 *

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4,837 **

MAGLC (ug/m3): 5,071

* This represents the sum of the maximum hourly styrene emission rates for the following emissions units: P007, P009, P015, P016, P020, P021, P026, P028, P029, P030, P032, P033, P034, P035, P038 and P040.

** This represents the predicted concentration based on the maximum hourly styrene emission rate of 12.5 lbs/hr.

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

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (bulk mold compounds or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Injection Press #480 (P027)

Activity Description: Injection press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #480	OAC rule 3745-31-05 (PTI #03-9409)	0.81 lb organic compounds (OC)/hr and 3.55 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.81 lb and 3.55 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.81 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 650 pounds per hour.; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
3.55 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #465	none	none

2. Additional Terms and Conditions

2.a This emissions unit was installed prior to May, 1986. Therefore, this emissions unit is not subject to Ohio EPA's "Air Toxic Policy."

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Injection Press #1009 (P028)

Activity Description: Injection press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #1009	OAC rule 3745-31-05 (PTI #03-9409)	0.11 lb organic compounds (OC)/hr and 0.48 ton OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.11 lb and 0.48 ton were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.11 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 100 pounds per hour; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
0.48 ton OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #1009	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-9409 issued on April 3, 1996: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. The permit to install for this emissions unit (P007) was evaluated based on the actual materials (bulk mold compounds and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m3): 213

Maximum Hourly Emission Rate (lbs/hr): 12.5 *

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4,837 **

MAGLC (ug/m3): 5,071

* This represents the sum of the maximum hourly styrene emission rates for the following emissions units: P007, P009, P015, P016, P020, P021, P026, P028, P029, P030, P032, P033, P034, P035, P038 and P040.

** This represents the predicted concentration based on the maximum hourly styrene emission rate of 12.5 lbs/hr.

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

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (bulk mold compounds or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Injection Press #1073 (P029)

Activity Description: Injection press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #6056	OAC rule 3745-31-05 (PTI #03-9409)	0.97 lb organic compounds (OC)/hr and 4.25 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.97 lb and 4.25 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.97 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 775 pounds per hour; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
4.25 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #6056	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-9409 issued on April 3, 1996: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. The permit to install for this emissions unit (P009) was evaluated based on the actual materials (bulk mold compounds and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m3): 213

Maximum Hourly Emission Rate (lbs/hr): 12.5 *

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4,837 **

MAGLC (ug/m3): 5,071

* This represents the sum of the maximum hourly styrene emission rates for the following emissions units: P007, P009, P015, P016, P020, P021, P026, P028, P029, P030, P032, P033, P034, P035, P038 and P040.

** This represents the predicted concentration based on the maximum hourly styrene emission rate of 12.5 lbs/hr.

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

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (bulk mold compounds or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy;" and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Injection Press #1074 (P030)

Activity Description: Injection press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #1074	OAC rule 3745-31-05 (PTI #03-9409)	0.81 lb organic compounds (OC)/hr and 3.55 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.81 lb and 3.55 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.81 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 650 pounds per hour; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
3.55 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #887	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-9409 issued on April 3, 1996: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. The permit to install for this emissions unit (P007) was evaluated based on the actual materials (bulk mold compounds and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m3): 213

Maximum Hourly Emission Rate (lbs/hr): 12.5 *

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4,837 **

MAGLC (ug/m3): 5,071

* This represents the sum of the maximum hourly styrene emission rates for the following emissions units: P007, P009, P015, P016, P020, P021, P026, P028, P029, P030, P032, P033, P034, P035, P038 and P040.

** This represents the predicted concentration based on the maximum hourly styrene emission rate of 12.5 lbs/hr.

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

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (bulk mold compounds or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Compression Press #435 (P031)

Activity Description: Compression press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
compression press - asset #435	OAC rule 3745-31-05 (PTI #03-9409)	0.73 lb organic compounds (OC)/hr and 3.2 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.97 lb and 4.25 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.73 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 460 pounds per hour.; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
3.2 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
compression press - asset #435	none	none

2. Additional Terms and Conditions

2.a This emissions unit was installed prior to May, 1986. Therefore, this emissions unit is not subject to Ohio EPA's "Air Toxic Policy."

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Compression Press #665 (P032)

Activity Description: Compression press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
compression press - asset #665	OAC rule 3745-31-05 (PTI #03-9409)	0.73 lb organic compounds (OC)/hr and 3.2 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.97 lb and 4.25 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.73 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 460 pounds per hour; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
3.2 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
compression press - asset #665	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-9409 issued on April 3, 1996: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. The permit to install for this emissions unit was evaluated based on the actual materials (bulk mold compounds and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m3): 213

Maximum Hourly Emission Rate (lbs/hr): 12.5 *

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4,837 **

MAGLC (ug/m3): 5,071

* This represents the sum of the maximum hourly styrene emission rates for the following emissions units: P007, P009, P015, P016, P020, P021, P026, P028, P029, P030, P032, P033, P034, P035, P038 and P040.

** This represents the predicted concentration based on the maximum hourly styrene emission rate of 12.5 lbs/hr.

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

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (bulk mold compounds or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy;" and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Compression Press #696 (P033)

Activity Description: Compression press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
compression press - asset #696	OAC rule 3745-31-05 (PTI #03-9409)	0.73 lb organic compounds (OC)/hr and 3.2 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.97 lb and 4.25 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.73 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 460 pounds per hour; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
3.2 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
compression press - asset #665	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-9409 issued on April 3, 1996: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. The permit to install for this emissions unit was evaluated based on the actual materials (bulk mold compounds and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m3): 213

Maximum Hourly Emission Rate (lbs/hr): 12.5 *

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4,837 **

MAGLC (ug/m3): 5,071

* This represents the sum of the maximum hourly styrene emission rates for the following emissions units: P007, P009, P015, P016, P020, P021, P026, P028, P029, P030, P032, P033, P034, P035, P038 and P040.

** This represents the predicted concentration based on the maximum hourly styrene emission rate of 12.5 lbs/hr.

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

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (bulk mold compounds or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy;" and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Compression Press #734 (P034)

Activity Description: Compression press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
compression press - asset #734	OAC rule 3745-31-05 (PTI #03-9409)	0.73 lb organic compounds (OC)/hr and 3.2 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.97 lb and 4.25 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.73 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 460 pounds per hour; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
3.2 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
compression press - asset #665	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-9409 issued on April 3, 1996: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. The permit to install for this emissions unit was evaluated based on the actual materials (bulk mold compounds and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m3): 213

Maximum Hourly Emission Rate (lbs/hr): 12.5 *

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4,837 **

MAGLC (ug/m3): 5,071

* This represents the sum of the maximum hourly styrene emission rates for the following emissions units: P007, P009, P015, P016, P020, P021, P026, P028, P029, P030, P032, P033, P034, P035, P038 and P040.

** This represents the predicted concentration based on the maximum hourly styrene emission rate of 12.5 lbs/hr.

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

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (bulk mold compounds or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy;" and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Compression Press #733 (P035)

Activity Description: Compression press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
compression press - asset #733	OAC rule 3745-31-05 (PTI #03-9409)	0.73 lb organic compounds (OC)/hr and 3.2 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.97 lb and 4.25 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.73 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 460 pounds per hour; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
3.2 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
compression press - asset #665	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-9409 issued on April 3, 1996: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. The permit to install for this emissions unit was evaluated based on the actual materials (bulk mold compounds and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m3): 213

Maximum Hourly Emission Rate (lbs/hr): 12.5 *

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4,837 **

MAGLC (ug/m3): 5,071

* This represents the sum of the maximum hourly styrene emission rates for the following emissions units: P007, P009, P015, P016, P020, P021, P026, P028, P029, P030, P032, P033, P034, P035, P038 and P040.

** This represents the predicted concentration based on the maximum hourly styrene emission rate of 12.5 lbs/hr.

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

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (bulk mold compounds or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy;" and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Injection Press #1139 (P038)

Activity Description: Injection press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #1139	OAC rule 3745-31-05 (PTI #03-9601)	0.25 lb organic compounds (OC)/hr and 1.1tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.25 lb and 1.1 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.25 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 460 pounds per hour; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
1.1 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #1139	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-9409 issued on April 3, 1996: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. The permit to install for this emissions unit was evaluated based on the actual materials (bulk mold compounds and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m3): 213

Maximum Hourly Emission Rate (lbs/hr): 12.5 *

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4,837 **

MAGLC (ug/m3): 5,071

* This represents the sum of the maximum hourly styrene emission rates for the following emissions units: P007, P009, P015, P016, P020, P021, P026, P028, P029, P030, P032, P033, P034, P035, P038 and P040.

** This represents the predicted concentration based on the maximum hourly styrene emission rate of 12.5 lbs/hr.

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

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (bulk mold compounds or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy;" and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Injection Press #1141 (P040)

Activity Description: Injection press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #1141	OAC rule 3745-31-05 (PTI #03-9601)	0.97 lb organic compounds (OC)/hr and 4.25 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 0.97 lb and 4.25 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.97 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 775 pounds per hour; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
4.25 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #1141	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-9409 issued on April 3, 1996: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. The permit to install for this emissions unit (P009) was evaluated based on the actual materials (bulk mold compounds and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m3): 213

Maximum Hourly Emission Rate (lbs/hr): 12.5 *

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4,837 **

MAGLC (ug/m3): 5,071

* This represents the sum of the maximum hourly styrene emission rates for the following emissions units: P007, P009, P015, P016, P020, P021, P026, P028, P029, P030, P032, P033, P034, P035, P038 and P040.

** This represents the predicted concentration based on the maximum hourly styrene emission rate of 12.5 lbs/hr.

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

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (bulk mold compounds or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy;" and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Injection Press #1439 (P042)

Activity Description: Injection press for molding fabricated products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #1439	OAC rule 3745-31-05 (PTI #03-9601)	1.0 lb organic compounds (OC)/hr and 4.38 tons OC/yr (see A.I.2.b)

2. Additional Terms and Conditions

2.a This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).

2.b The hourly and annual OC emission limitations of 1.0 lb and 4.38 tons were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

II. Operational Restrictions

1. Each bulk mold compound (BMC) employed in this emissions unit shall contain no more than 6.8 percent, by weight, of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each day the OC (styrene) content (in percent, by weight) for each bulk molding compound employed for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each of the bulk molding compounds that exceeded the styrene content restriction in section A.II.1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
1.0 lb OC/hr

Applicable Compliance Method:
The permittee shall determine compliance as follows:

i. multiply the maximum styrene content of the bulk molding compounds (6.8 percent, by weight) by a volatilization emission factor of 0.0186 (1.86 percent, by weight);

ii. multiply 1.a.i above by the maximum injection molding rate of 775 pounds per hour; and

iii. multiply 1.a.ii above by 0.9875 [it has been determined that 98.75 percent of the original styrene is retained in the BMC prior to being processed in the injection press].

1.b Emission Limitation:
4.38 tons OC/yr

Applicable Compliance Method:
Compliance with the annual OC limitation will be assumed as long as compliance with the hourly OC limitation and the BMC styrene content restriction are maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
injection press - asset #1439	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-9409 issued on April 3, 1996: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. The permit to install for this emissions unit (P009) was evaluated based on the actual materials (bulk mold compounds and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m3): 213

Maximum Hourly Emission Rate (lbs/hr): 12.5 *

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4,837 **

MAGLC (ug/m3): 5,071

* This represents the sum of the maximum hourly styrene emission rates for the following emissions units: P007, P009, P015, P016, P020, P021, P026, P028, P029, P030, P032, P033, P034, P035, P038 and P040.

** This represents the predicted concentration based on the maximum hourly styrene emission rate of 12.5 lbs/hr.

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

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (bulk mold compounds or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy;" and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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