



State of Ohio Environmental Protection Agency

Street Address:

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P.O. Box 1049
Columbus, OH 43216-1049

01/31/00

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

03-88-00-0002
The Budd Co., Plasitics Div.- Carey
Vinod C. Shah
1850 Research Drive
Troy, MI 48083-2167

Dear Vinod C. Shah:

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,

A handwritten signature in black ink that reads "Thomas G. Rigo". The signature is written in a cursive style with a large, stylized initial "T".

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
Michigan



Ohio EPA

State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 01/31/00

Effective Date:

Expiration Date:

The duration of this permit will be five years.

This document constitutes issuance to:

The Budd Co., Plastics Div.- Carey
2915 County Road 96
Carey, OH 43316

of a Title V permit for Facility ID: 03-88-00-0002

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

P008 (Press #1)

Compression molding of sheet molding compound (SMC) and associated milling operations

P009 (Press #2)

Compression molding of sheet molding compound (SMC) and associated milling operations

P010 (Press #3)

Compression molding of sheet molding compound (SMC) and associated milling operations

P011 (Press #4)

Compression molding of sheet molding compound (SMC) and associated milling operations

P012 (Press #5)

Compression molding of sheet molding compound (SMC) and associated milling operations

P013 (Press #6)

Compression molding of sheet molding compound (SMC) and associated milling operations

P014 (Press #7)

Compression molding of sheet molding compound (SMC) and associated milling operations

P015 (Press #8)

Compression molding of sheet molding compound (SMC) and associated milling operations

P016 (Press #9)

Compression molding of sheet molding compound (SMC) and associated milling operations

P017 (Press #10)

Compression molding of sheet molding compound (SMC) and associated milling operations

P018 (Press #11)

Compression molding of sheet molding compound (SMC) and associated milling operations

P019 (Press #12)

Compression molding of sheet molding compound (SMC) and associated milling operations

P020 (Press #14)

Compression molding of sheet molding compound (SMC) and associated milling operations

P021 (Press #15)

Compression molding of sheet molding compound (SMC) and associated milling operations

P022 (Press #16)

Compression molding of sheet molding compound (SMC) and associated milling operations

P023 (Press #30)

Compression molding of sheet molding compound (SMC) and associated milling operations

P024 (Press #31)

Compression molding of sheet molding compound (SMC) and associated milling operations

P025 (Press #32)

Compression molding of sheet molding compound (SMC) and associated milling operations

P033 (Press #18)

Compression molding of sheet molding compound (SMC)

P034 (Press #19)

Compression molding of sheet molding compound (SMC)

P901 (Secondary Finishing Operations)

Secondary finishing (deflashing, sanding, routing, drilling, milling, trimming) operations

R005 (Paint Booth #1)

Primer Paint Spray Booth #1

R006 (Paint Booth #2)

Primer Paint Spray Booth #2

R007 (Paint Booth #3)

Primer Paint Spray Booth #3

R008 (Paint Booth #4)

Primer Paint Spray Booth #4

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 emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be 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 monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. 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 Federally Enforceable 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

1. Risk Management Plans: If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

B. State Only Enforceable Section

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

B012 - Boiler #4, 9.66 mmBTU/hr input
P005 - Parts Washer
P007 - Bake Oven
Z001 - Air Make Up Unit #1
Z002 - Air Make Up Unit #2
Z003 - Air Make Up Unit #3
Z004 - Air Make Up Unit #4
Z005 - Bonding Area A
Z006 - Bonding Area B
Z007 - Bonding Area C
Z008 - Paint Mix Room
Z009 - Touch Up Area A
Z010 - Touch Up Area B
Z011 - Touch Up Area C
Z012 - Touch Up Area D
Z013 - Touch Up Area E
Z014 - Touch Up Area F
Z015 - Touch Up Area G
Z016 - Paint Tech Area

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: Press #1 (P008)

Activity Description: Compression molding of sheet molding compound (SMC) and associated milling operations

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #1	OAC rule 3745-31-05 (PTI #03-13087)	See sections A.I.2.b, A.I.2.c, A.I.2.e and A.II.1 below.
	OAC rule 3745-31-05 (PTI #03-9135)	See A.I.2.f and g.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emission limitations for all compression sheet mold presses at the facility are based on the total amount of sheet molding compound (SMC) used on a daily and annual basis. Since it is infeasible for the permittee to track SMC usages for each individual press, the emission limitations are based on the maximum daily and annual usage of SMC in all the presses at the facility. (This tracking approach requires the permittee to accept OC emission limitations for presses #1, #2, #3, #4, #8, #12, #16, # 30, #31, and #32, Ohio EPA emissions units numbers P008, P009, P010, P011, P015, P019, P022, P023, P024, and P025, respectively, which were installed prior to January 1, 1974 and would normally be exempt from any mass OC emission limitation.)
- 2.b The permittee shall not emit more than 81.6 tons of OC per rolling, 365-day period from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.c The permittee shall not emit more than 11.7 tons of OC per rolling, 12-month period from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.
- 2.e The permittee shall not emit more than 652.4 pounds of OC per day from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.f The permittee shall not emit more than 1.28 pounds of OC per hour from this emissions unit. The 1.28 pounds per hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- 2.g The permittee shall not emit more than 2.0 tons of OC per month from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined.

II. Operational Restrictions

1. Total raw SMC usage in emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined, shall not exceed 186,400 lbs/day (93.2 tons/day) and 46.6 million lbs per rolling, 365-day period (23,300 tons per rolling, 365-day period).
2. The raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed, and placed in closed containers to will minimize volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for all the compression molding operations combined:
 - a. the total mass of raw SMC used in all compression molding presses, in tons;
 - b. the total mass of raw SMC that was preheated before use in the presses, in tons;
 - c. the total mass of raw SMC not preheated (a - b), in tons.
 - d. the rolling, 365-day SMC usage rate, in tons, for all compression molding presses [this is calculated by summing the raw SMC usage for the preceding 364 calendar days (from section 1.a above) + the raw SMC usage for the current calendar day];
 - e. the OC emission rate for all compression molding operations, calculated using the following formula:

$$E = (M1 \times F1) + (M2 \times F2)$$

where,

E = the daily OC emissions, in pounds

M1* = the mass of raw SMC used (with preheating) that day, in tons

M2* = the mass of raw SMC used (without preheating) that day, in tons

* not including scrap

F1 = an emission factor of 7 pounds OC per ton of raw SMC used (with preheating)

F2 = an emission factor of 4 pounds OC per ton of raw SMC used (without preheating); and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.

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

2. The permittee shall collect and record the following information each month for all the scrap generation operations combined:
 - a. the identification of each type of scrap SMC generated;
 - b. the mass, in pounds, of each type of scrap SMC generated;
 - c. the monomeric styrene content of each type of scrap SMC generated, in percent by weight;
 - d. the OC emission rate for each type of scrap SMC generated ($b \times c \times 0.4$)*, in tons;
 - e. the total OC emission rate for all the types of scrap SMC generated (summation of d for all types of scrap SMC generated), in tons; and
 - f. the rolling, 12-month OC emission rate for all the scrap generation operations, in tons.

* The 0.40 value is a company-supplied styrene volatilization emission factor.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day OC emission limitation of 81.6 tons for all compression molding operations;
 - b. all exceedances of the rolling, 12-month OC emission limitation of 11.7 tons for all scrap generation options;
 - c. all exceedances of the raw SMC usage restrictions of 186,400 pounds per day and 46.6 million pounds per rolling, 365-day period;
 - d. all exceedances of the daily OC emission limitation of 652.4 pounds all compression molding operations; and
 - e. all exceedances of the monthly OC emission limitation of 2.0 tons for all scrap generation options.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions, in tons, for the compression molding operations and scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined. These 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
81.6 tons OC per rolling, 365-day period (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
11.7 tons OC per rolling, 12-month period (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.c** Usage Restriction:
186,400 lbs raw SMC/day
46.6 million lbs raw SMC/rolling, 365-day period
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.d** Emission Limitation:
1.28 pounds of OC per hour
- Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly limitation above by multiplying the maximum daily SMC usage (4650 pounds) by a company-supplied volatilization emission factor of 0.0055, and then dividing by 20.
- 1.e** Emission Limitation:
652.4 pounds of OC per day (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.f** Emission Limitation:
2.0 tons of OC per month (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 2.** Formulation data shall be used to determine the monomeric styrene content of the all scrap SMC 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #1	none	none

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: Press #2 (P009)

Activity Description: Compression molding of sheet molding compound (SMC) and associated milling operations

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #2	OAC rule 3745-31-05 (PTI #03-13087)	See sections A.I.2.b, A.I.2.c, A.I.2.e and A.II.1 below.
	OAC rule 3745-31-05 (PTI #03-9135)	See A.I.2.f and g.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emission limitations for all compression sheet mold presses at the facility are based on the total amount of sheet molding compound (SMC) used on a daily and annual basis. Since it is infeasible for the permittee to track SMC usages for each individual press, the emission limitations are based on the maximum daily and annual usage of SMC in all the presses at the facility. (This tracking approach requires the permittee to accept OC emission limitations for presses #1, #2, #3, #4, #8, #12, #16, # 30, #31, and #32, Ohio EPA emissions units numbers P008, P009, P010, P011, P015, P019, P022, P023, P024, and P025, respectively, which were installed prior to January 1, 1974 and would normally be exempt from any mass OC emission limitation.)
- 2.b The permittee shall not emit more than 81.6 tons of OC per rolling, 365-day period from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.c The permittee shall not emit more than 11.7 tons of OC per rolling, 12-month period from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.
- 2.e The permittee shall not emit more than 652.4 pounds of OC per day from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.f The permittee shall not emit more than 2.72 pounds of OC per hour from this emissions unit. The 2.72 pounds per hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- 2.g The permittee shall not emit more than 2.0 tons of OC per month from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined.

II. Operational Restrictions

1. Total raw SMC usage in emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined, shall not exceed 186,400 lbs/day (93.2 tons/day) and 46.6 million lbs per rolling, 365-day period (23,300 tons per rolling, 365-day period).
2. The raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed, and placed in closed containers to will minimize volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for all the compression molding operations combined:
 - a. the total mass of raw SMC used in all compression molding presses, in tons;
 - b. the total mass of raw SMC that was preheated before use in the presses, in tons;
 - c. the total mass of raw SMC not preheated (a - b), in tons.
 - d. the rolling, 365-day SMC usage rate, in tons, for all compression molding presses [this is calculated by summing the raw SMC usage for the preceding 364 calendar days (from section 1.a above) + the raw SMC usage for the current calendar day];
 - e. the OC emission rate for all compression molding operations, calculated using the following formula:

$$E = (M1 \times F1) + (M2 \times F2)$$

where,

E = the daily OC emissions, in pounds

M1* = the mass of raw SMC used (with preheating) that day, in tons

M2* = the mass of raw SMC used (without preheating) that day, in tons

* not including scrap

F1 = an emission factor of 7 pounds OC per ton of raw SMC used (with preheating)

F2 = an emission factor of 4 pounds OC per ton of raw SMC used (without preheating); and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.

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

2. The permittee shall collect and record the following information each month for all the scrap generation operations combined:
 - a. the identification of each type of scrap SMC generated;
 - b. the mass, in pounds, of each type of scrap SMC generated;
 - c. the monomeric styrene content of each type of scrap SMC generated, in percent by weight;
 - d. the OC emission rate for each type of scrap SMC generated ($b \times c \times 0.4$)*, in tons;
 - e. the total OC emission rate for all the types of scrap SMC generated (summation of d for all types of scrap SMC generated), in tons; and
 - f. the rolling, 12-month OC emission rate for all the scrap generation operations, in tons.

* The 0.40 value is a company-supplied styrene volatilization emission factor.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day OC emission limitation of 81.6 tons for all compression molding operations;
 - b. all exceedances of the rolling, 12-month OC emission limitation of 11.7 tons for all scrap generation options;
 - c. all exceedances of the raw SMC usage restrictions of 186,400 pounds per day and 46.6 million pounds per rolling, 365-day period;
 - d. all exceedances of the daily OC emission limitation of 652.4 pounds all compression molding operations; and
 - e. all exceedances of the monthly OC emission limitation of 2.0 tons for all scrap generation options.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions, in tons, for the compression molding operations and scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined. These 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
81.6 tons OC per rolling, 365-day period (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
11.7 tons OC per rolling, 12-month period (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.c** Usage Restriction:
186,400 lbs raw SMC/day
46.6 million lbs raw SMC/rolling, 365-day period
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.d** Emission Limitation:
2.72 pounds of OC per hour
- Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly limitation above by multiplying the maximum daily SMC usage (9,891 pounds) by a company-supplied volatilization emission factor of 0.0055, and then dividing by 20.
- 1.e** Emission Limitation:
652.4 pounds of OC per day (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.f** Emission Limitation:
2.0 tons of OC per month (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 2.** Formulation data shall be used to determine the monomeric styrene content of the all scrap SMC 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #2	none	none

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: Press #3 (P010)

Activity Description: Compression molding of sheet molding compound (SMC) and associated milling operations

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #3	OAC rule 3745-31-05 (PTI #03-13087)	See sections A.I.2.b, A.I.2.c, A.I.2.e and A.II.1 below.
	OAC rule 3745-31-05 (PTI #03-9135)	See A.I.2.f and g.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emission limitations for all compression sheet mold presses at the facility are based on the total amount of sheet molding compound (SMC) used on a daily and annual basis. Since it is infeasible for the permittee to track SMC usages for each individual press, the emission limitations are based on the maximum daily and annual usage of SMC in all the presses at the facility. (This tracking approach requires the permittee to accept OC emission limitations for presses #1, #2, #3, #4, #8, #12, #16, # 30, #31, and #32, Ohio EPA emissions units numbers P008, P009, P010, P011, P015, P019, P022, P023, P024, and P025, respectively, which were installed prior to January 1, 1974 and would normally be exempt from any mass OC emission limitation.)
- 2.b The permittee shall not emit more than 81.6 tons of OC per rolling, 365-day period from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.c The permittee shall not emit more than 11.7 tons of OC per rolling, 12-month period from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.
- 2.e The permittee shall not emit more than 652.4 pounds of OC per day from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.f The permittee shall not emit more than 2.48 pounds of OC per hour from this emissions unit. The 2.48 pounds per hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- 2.g The permittee shall not emit more than 2.0 tons of OC per month from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined.

II. Operational Restrictions

1. Total raw SMC usage in emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined, shall not exceed 186,400 lbs/day (93.2 tons/day) and 46.6 million lbs per rolling, 365-day period (23,300 tons per rolling, 365-day period).
2. The raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed, and placed in closed containers to will minimize volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for all the compression molding operations combined:
 - a. the total mass of raw SMC used in all compression molding presses, in tons;
 - b. the total mass of raw SMC that was preheated before use in the presses, in tons;
 - c. the total mass of raw SMC not preheated (a - b), in tons.
 - d. the rolling, 365-day SMC usage rate, in tons, for all compression molding presses [this is calculated by summing the raw SMC usage for the preceding 364 calendar days (from section 1.a above) + the raw SMC usage for the current calendar day];
 - e. the OC emission rate for all compression molding operations, calculated using the following formula:

$$E = (M1 \times F1) + (M2 \times F2)$$

where,

E = the daily OC emissions, in pounds

M1* = the mass of raw SMC used (with preheating) that day, in tons

M2* = the mass of raw SMC used (without preheating) that day, in tons

* not including scrap

F1 = an emission factor of 7 pounds OC per ton of raw SMC used (with preheating)

F2 = an emission factor of 4 pounds OC per ton of raw SMC used (without preheating); and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.

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

2. The permittee shall collect and record the following information each month for all the scrap generation operations combined:
 - a. the identification of each type of scrap SMC generated;
 - b. the mass, in pounds, of each type of scrap SMC generated;
 - c. the monomeric styrene content of each type of scrap SMC generated, in percent by weight;
 - d. the OC emission rate for each type of scrap SMC generated ($b \times c \times 0.4$)*, in tons;
 - e. the total OC emission rate for all the types of scrap SMC generated (summation of d for all types of scrap SMC generated), in tons; and
 - f. the rolling, 12-month OC emission rate for all the scrap generation operations, in tons.

* The 0.40 value is a company-supplied styrene volatilization emission factor.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day OC emission limitation of 81.6 tons for all compression molding operations;
 - b. all exceedances of the rolling, 12-month OC emission limitation of 11.7 tons for all scrap generation options;
 - c. all exceedances of the raw SMC usage restrictions of 186,400 pounds per day and 46.6 million pounds per rolling, 365-day period;
 - d. all exceedances of the daily OC emission limitation of 652.4 pounds all compression molding operations; and
 - e. all exceedances of the monthly OC emission limitation of 2.0 tons for all scrap generation options.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions, in tons, for the compression molding operations and scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined. These 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
81.6 tons OC per rolling, 365-day period (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
11.7 tons OC per rolling, 12-month period (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.c** Usage Restriction:
186,400 lbs raw SMC/day
46.6 million lbs raw SMC/rolling, 365-day period
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.d** Emission Limitation:
2.48 pounds of OC per hour
- Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly limitation above by multiplying the maximum daily SMC usage (9,018 pounds) by a company-supplied volatilization emission factor of 0.0055, and then dividing by 20.
- 1.e** Emission Limitation:
652.4 pounds of OC per day (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.f** Emission Limitation:
2.0 tons of OC per month (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 2.** Formulation data shall be used to determine the monomeric styrene content of the all scrap SMC 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #3	none	none

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: Press #4 (P011)

Activity Description: Compression molding of sheet molding compound (SMC) and associated milling operations

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #4	OAC rule 3745-31-05 (PTI #03-13087)	See sections A.I.2.b, A.I.2.c, A.I.2.e and A.II.1 below.
	OAC rule 3745-31-05 (PTI #03-9135)	See A.I.2.f and g.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emission limitations for all compression sheet mold presses at the facility are based on the total amount of sheet molding compound (SMC) used on a daily and annual basis. Since it is infeasible for the permittee to track SMC usages for each individual press, the emission limitations are based on the maximum daily and annual usage of SMC in all the presses at the facility. (This tracking approach requires the permittee to accept OC emission limitations for presses #1, #2, #3, #4, #8, #12, #16, # 30, #31, and #32, Ohio EPA emissions units numbers P008, P009, P010, P011, P015, P019, P022, P023, P024, and P025, respectively, which were installed prior to January 1, 1974 and would normally be exempt from any mass OC emission limitation.)
- 2.b The permittee shall not emit more than 81.6 tons of OC per rolling, 365-day period from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.c The permittee shall not emit more than 11.7 tons of OC per rolling, 12-month period from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.
- 2.e The permittee shall not emit more than 652.4 pounds of OC per day from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.f The permittee shall not emit more than 1.2 pounds of OC per hour from this emissions unit. The 1.2 pounds per hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- 2.g The permittee shall not emit more than 2.0 tons of OC per month from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined.

II. Operational Restrictions

1. Total raw SMC usage in emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined, shall not exceed 186,400 lbs/day (93.2 tons/day) and 46.6 million lbs per rolling, 365-day period (23,300 tons per rolling, 365-day period).
2. The raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed, and placed in closed containers to will minimize volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for all the compression molding operations combined:
 - a. the total mass of raw SMC used in all compression molding presses, in tons;
 - b. the total mass of raw SMC that was preheated before use in the presses, in tons;
 - c. the total mass of raw SMC not preheated (a - b), in tons.
 - d. the rolling, 365-day SMC usage rate, in tons, for all compression molding presses [this is calculated by summing the raw SMC usage for the preceding 364 calendar days (from section 1.a above) + the raw SMC usage for the current calendar day];
 - e. the OC emission rate for all compression molding operations, calculated using the following formula:

$$E = (M1 \times F1) + (M2 \times F2)$$

where,

E = the daily OC emissions, in pounds

M1* = the mass of raw SMC used (with preheating) that day, in tons

M2* = the mass of raw SMC used (without preheating) that day, in tons

* not including scrap

F1 = an emission factor of 7 pounds OC per ton of raw SMC used (with preheating)

F2 = an emission factor of 4 pounds OC per ton of raw SMC used (without preheating); and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.

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

2. The permittee shall collect and record the following information each month for all the scrap generation operations combined:
 - a. the identification of each type of scrap SMC generated;
 - b. the mass, in pounds, of each type of scrap SMC generated;
 - c. the monomeric styrene content of each type of scrap SMC generated, in percent by weight;
 - d. the OC emission rate for each type of scrap SMC generated ($b \times c \times 0.4$)*, in tons;
 - e. the total OC emission rate for all the types of scrap SMC generated (summation of d for all types of scrap SMC generated), in tons; and
 - f. the rolling, 12-month OC emission rate for all the scrap generation operations, in tons.

* The 0.40 value is a company-supplied styrene volatilization emission factor.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day OC emission limitation of 81.6 tons for all compression molding operations;
 - b. all exceedances of the rolling, 12-month OC emission limitation of 11.7 tons for all scrap generation options;
 - c. all exceedances of the raw SMC usage restrictions of 186,400 pounds per day and 46.6 million pounds per rolling, 365-day period;
 - d. all exceedances of the daily OC emission limitation of 652.4 pounds all compression molding operations; and
 - e. all exceedances of the monthly OC emission limitation of 2.0 tons for all scrap generation options.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions, in tons, for the compression molding operations and scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined. These 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
81.6 tons OC per rolling, 365-day period (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
11.7 tons OC per rolling, 12-month period (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.c** Usage Restriction:
186,400 lbs raw SMC/day
46.6 million lbs raw SMC/rolling, 365-day period
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.d** Emission Limitation:
1.2 pounds of OC per hour
- Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly limitation above by multiplying the maximum daily SMC usage (4,364 pounds) by a company-supplied volatilization emission factor of 0.0055, and then dividing by 20.
- 1.e** Emission Limitation:
652.4 pounds of OC per day (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.f** Emission Limitation:
2.0 tons of OC per month (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 2.** Formulation data shall be used to determine the monomeric styrene content of the all scrap SMC 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #4	none	none

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: Press #5 (P012)

Activity Description: Compression molding of sheet molding compound (SMC) and associated milling operations

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #5	OAC rule 3745-31-05 (PTI #03-13087)	See sections A.I.2.b, A.I.2.c, A.I.2.e and A.II.1 below.
	OAC rule 3745-31-05 (PTI #03-9135)	See A.I.2.f and g.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emission limitations for all compression sheet mold presses at the facility are based on the total amount of sheet molding compound (SMC) used on a daily and annual basis. Since it is infeasible for the permittee to track SMC usages for each individual press, the emission limitations are based on the maximum daily and annual usage of SMC in all the presses at the facility. (This tracking approach requires the permittee to accept OC emission limitations for presses #1, #2, #3, #4, #8, #12, #16, # 30, #31, and #32, Ohio EPA emissions units numbers P008, P009, P010, P011, P015, P019, P022, P023, P024, and P025, respectively, which were installed prior to January 1, 1974 and would normally be exempt from any mass OC emission limitation.)
- 2.b The permittee shall not emit more than 81.6 tons of OC per rolling, 365-day period from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.c The permittee shall not emit more than 11.7 tons of OC per rolling, 12-month period from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.
- 2.e The permittee shall not emit more than 652.4 pounds of OC per day from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.f The permittee shall not emit more than 2.32 pounds of OC per hour from this emissions unit. The 2.32 pounds per hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- 2.g The permittee shall not emit more than 2.0 tons of OC per month from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined.

II. Operational Restrictions

1. Total raw SMC usage in emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined, shall not exceed 186,400 lbs/day (93.2 tons/day) and 46.6 million lbs per rolling, 365-day period (23,300 tons per rolling, 365-day period).
2. The raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed, and placed in closed containers to will minimize volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for all the compression molding operations combined:
 - a. the total mass of raw SMC used in all compression molding presses, in tons;
 - b. the total mass of raw SMC that was preheated before use in the presses, in tons;
 - c. the total mass of raw SMC not preheated (a - b), in tons.
 - d. the rolling, 365-day SMC usage rate, in tons, for all compression molding presses [this is calculated by summing the raw SMC usage for the preceding 364 calendar days (from section 1.a above) + the raw SMC usage for the current calendar day];
 - e. the OC emission rate for all compression molding operations, calculated using the following formula:

$$E = (M1 \times F1) + (M2 \times F2)$$

where,

E = the daily OC emissions, in pounds

M1* = the mass of raw SMC used (with preheating) that day, in tons

M2* = the mass of raw SMC used (without preheating) that day, in tons

* not including scrap

F1 = an emission factor of 7 pounds OC per ton of raw SMC used (with preheating)

F2 = an emission factor of 4 pounds OC per ton of raw SMC used (without preheating); and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.

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

2. The permittee shall collect and record the following information each month for all the scrap generation operations combined:
 - a. the identification of each type of scrap SMC generated;
 - b. the mass, in pounds, of each type of scrap SMC generated;
 - c. the monomeric styrene content of each type of scrap SMC generated, in percent by weight;
 - d. the OC emission rate for each type of scrap SMC generated ($b \times c \times 0.4$)*, in tons;
 - e. the total OC emission rate for all the types of scrap SMC generated (summation of d for all types of scrap SMC generated), in tons; and
 - f. the rolling, 12-month OC emission rate for all the scrap generation operations, in tons.

* The 0.40 value is a company-supplied styrene volatilization emission factor.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day OC emission limitation of 81.6 tons for all compression molding operations;
 - b. all exceedances of the rolling, 12-month OC emission limitation of 11.7 tons for all scrap generation options;
 - c. all exceedances of the raw SMC usage restrictions of 186,400 pounds per day and 46.6 million pounds per rolling, 365-day period;
 - d. all exceedances of the daily OC emission limitation of 652.4 pounds all compression molding operations; and
 - e. all exceedances of the monthly OC emission limitation of 2.0 tons for all scrap generation options.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions, in tons, for the compression molding operations and scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined. These 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
81.6 tons OC per rolling, 365-day period (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
11.7 tons OC per rolling, 12-month period (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.c** Usage Restriction:
186,400 lbs raw SMC/day
46.6 million lbs raw SMC/rolling, 365-day period
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.d** Emission Limitation:
2.32 pounds of OC per hour
- Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly limitation above by multiplying the maximum daily SMC usage (8,436 pounds) by a company-supplied volatilization emission factor of 0.0055, and then dividing by 20.
- 1.e** Emission Limitation:
652.4 pounds of OC per day (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.f** Emission Limitation:
2.0 tons of OC per month (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 2.** Formulation data shall be used to determine the monomeric styrene content of the all scrap SMC 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #5	none	none

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: Press #6 (P013)

Activity Description: Compression molding of sheet molding compound (SMC) and associated milling operations

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #6	OAC rule 3745-31-05 (PTI #03-13087)	See sections A.I.2.b, A.I.2.c, A.I.2.e and A.II.1 below.
	OAC rule 3745-31-05 (PTI #03-9135)	See A.I.2.f and g.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emission limitations for all compression sheet mold presses at the facility are based on the total amount of sheet molding compound (SMC) used on a daily and annual basis. Since it is infeasible for the permittee to track SMC usages for each individual press, the emission limitations are based on the maximum daily and annual usage of SMC in all the presses at the facility. (This tracking approach requires the permittee to accept OC emission limitations for presses #1, #2, #3, #4, #8, #12, #16, # 30, #31, and #32, Ohio EPA emissions units numbers P008, P009, P010, P011, P015, P019, P022, P023, P024, and P025, respectively, which were installed prior to January 1, 1974 and would normally be exempt from any mass OC emission limitation.)
- 2.b The permittee shall not emit more than 81.6 tons of OC per rolling, 365-day period from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.c The permittee shall not emit more than 11.7 tons of OC per rolling, 12-month period from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.
- 2.e The permittee shall not emit more than 652.4 pounds of OC per day from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.f The permittee shall not emit more than 2.4 pounds of OC per hour from this emissions unit. The 2.4 pounds per hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- 2.g The permittee shall not emit more than 2.0 tons of OC per month from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined.

II. Operational Restrictions

1. Total raw SMC usage in emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined, shall not exceed 186,400 lbs/day (93.2 tons/day) and 46.6 million lbs per rolling, 365-day period (23,300 tons per rolling, 365-day period).
2. The raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed, and placed in closed containers to will minimize volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for all the compression molding operations combined:
 - a. the total mass of raw SMC used in all compression molding presses, in tons;
 - b. the total mass of raw SMC that was preheated before use in the presses, in tons;
 - c. the total mass of raw SMC not preheated (a - b), in tons.
 - d. the rolling, 365-day SMC usage rate, in tons, for all compression molding presses [this is calculated by summing the raw SMC usage for the preceding 364 calendar days (from section 1.a above) + the raw SMC usage for the current calendar day];
 - e. the OC emission rate for all compression molding operations, calculated using the following formula:

$$E = (M1 \times F1) + (M2 \times F2)$$

where,

E = the daily OC emissions, in pounds

M1* = the mass of raw SMC used (with preheating) that day, in tons

M2* = the mass of raw SMC used (without preheating) that day, in tons

* not including scrap

F1 = an emission factor of 7 pounds OC per ton of raw SMC used (with preheating)

F2 = an emission factor of 4 pounds OC per ton of raw SMC used (without preheating); and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.

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

2. The permittee shall collect and record the following information each month for all the scrap generation operations combined:
 - a. the identification of each type of scrap SMC generated;
 - b. the mass, in pounds, of each type of scrap SMC generated;
 - c. the monomeric styrene content of each type of scrap SMC generated, in percent by weight;
 - d. the OC emission rate for each type of scrap SMC generated ($b \times c \times 0.4$)*, in tons;
 - e. the total OC emission rate for all the types of scrap SMC generated (summation of d for all types of scrap SMC generated), in tons; and
 - f. the rolling, 12-month OC emission rate for all the scrap generation operations, in tons.

* The 0.40 value is a company-supplied styrene volatilization emission factor.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day OC emission limitation of 81.6 tons for all compression molding operations;
 - b. all exceedances of the rolling, 12-month OC emission limitation of 11.7 tons for all scrap generation options;
 - c. all exceedances of the raw SMC usage restrictions of 186,400 pounds per day and 46.6 million pounds per rolling, 365-day period;
 - d. all exceedances of the daily OC emission limitation of 652.4 pounds all compression molding operations; and
 - e. all exceedances of the monthly OC emission limitation of 2.0 tons for all scrap generation options.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions, in tons, for the compression molding operations and scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined. These 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
81.6 tons OC per rolling, 365-day period (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
11.7 tons OC per rolling, 12-month period (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.c** Usage Restriction:
186,400 lbs raw SMC/day
46.6 million lbs raw SMC/rolling, 365-day period
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.d** Emission Limitation:
2.4 pounds of OC per hour
- Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly limitation above by multiplying the maximum daily SMC usage (8,727 pounds) by a company-supplied volatilization emission factor of 0.0055, and then dividing by 20.
- 1.e** Emission Limitation:
652.4 pounds of OC per day (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.f** Emission Limitation:
2.0 tons of OC per month (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 2.** Formulation data shall be used to determine the monomeric styrene content of the all scrap SMC 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #6	none	none

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: Press #7 (P014)

Activity Description: Compression molding of sheet molding compound (SMC) and associated milling operations

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #7	OAC rule 3745-31-05 (PTI #03-13087)	See sections A.I.2.b, A.I.2.c, A.I.2.e and A.II.1 below.
	OAC rule 3745-31-05 (PTI #03-9135)	See A.I.2.f and g.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emission limitations for all compression sheet mold presses at the facility are based on the total amount of sheet molding compound (SMC) used on a daily and annual basis. Since it is infeasible for the permittee to track SMC usages for each individual press, the emission limitations are based on the maximum daily and annual usage of SMC in all the presses at the facility. (This tracking approach requires the permittee to accept OC emission limitations for presses #1, #2, #3, #4, #8, #12, #16, # 30, #31, and #32, Ohio EPA emissions units numbers P008, P009, P010, P011, P015, P019, P022, P023, P024, and P025, respectively, which were installed prior to January 1, 1974 and would normally be exempt from any mass OC emission limitation.)
- 2.b The permittee shall not emit more than 81.6 tons of OC per rolling, 365-day period from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.c The permittee shall not emit more than 11.7 tons of OC per rolling, 12-month period from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.
- 2.e The permittee shall not emit more than 652.4 pounds of OC per day from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.f The permittee shall not emit more than 2.0 pounds of OC per hour from this emissions unit. The 2.0 pounds per hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- 2.g The permittee shall not emit more than 2.0 tons of OC per month from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined.

II. Operational Restrictions

1. Total raw SMC usage in emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined, shall not exceed 186,400 lbs/day (93.2 tons/day) and 46.6 million lbs per rolling, 365-day period (23,300 tons per rolling, 365-day period).
2. The raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed, and placed in closed containers to will minimize volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for all the compression molding operations combined:
 - a. the total mass of raw SMC used in all compression molding presses, in tons;
 - b. the total mass of raw SMC that was preheated before use in the presses, in tons;
 - c. the total mass of raw SMC not preheated (a - b), in tons.
 - d. the rolling, 365-day SMC usage rate, in tons, for all compression molding presses [this is calculated by summing the raw SMC usage for the preceding 364 calendar days (from section 1.a above) + the raw SMC usage for the current calendar day];
 - e. the OC emission rate for all compression molding operations, calculated using the following formula:

$$E = (M1 \times F1) + (M2 \times F2)$$

where,

E = the daily OC emissions, in pounds

M1* = the mass of raw SMC used (with preheating) that day, in tons

M2* = the mass of raw SMC used (without preheating) that day, in tons

* not including scrap

F1 = an emission factor of 7 pounds OC per ton of raw SMC used (with preheating)

F2 = an emission factor of 4 pounds OC per ton of raw SMC used (without preheating); and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.

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

2. The permittee shall collect and record the following information each month for all the scrap generation operations combined:
 - a. the identification of each type of scrap SMC generated;
 - b. the mass, in pounds, of each type of scrap SMC generated;
 - c. the monomeric styrene content of each type of scrap SMC generated, in percent by weight;
 - d. the OC emission rate for each type of scrap SMC generated ($b \times c \times 0.4$)*, in tons;
 - e. the total OC emission rate for all the types of scrap SMC generated (summation of d for all types of scrap SMC generated), in tons; and
 - f. the rolling, 12-month OC emission rate for all the scrap generation operations, in tons.

* The 0.40 value is a company-supplied styrene volatilization emission factor.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day OC emission limitation of 81.6 tons for all compression molding operations;
 - b. all exceedances of the rolling, 12-month OC emission limitation of 11.7 tons for all scrap generation options;
 - c. all exceedances of the raw SMC usage restrictions of 186,400 pounds per day and 46.6 million pounds per rolling, 365-day period;
 - d. all exceedances of the daily OC emission limitation of 652.4 pounds all compression molding operations; and
 - e. all exceedances of the monthly OC emission limitation of 2.0 tons for all scrap generation options.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions, in tons, for the compression molding operations and scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined. These 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
81.6 tons OC per rolling, 365-day period (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
11.7 tons OC per rolling, 12-month period (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.c** Usage Restriction:
186,400 lbs raw SMC/day
46.6 million lbs raw SMC/rolling, 365-day period
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.d** Emission Limitation:
2.0 pounds of OC per hour
- Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly limitation above by multiplying the maximum daily SMC usage (7,273 pounds) by a company-supplied volatilization emission factor of 0.0055, and then dividing by 20.
- 1.e** Emission Limitation:
652.4 pounds of OC per day (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.f** Emission Limitation:
2.0 tons of OC per month (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 2.** Formulation data shall be used to determine the monomeric styrene content of the all scrap SMC 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #7	none	none

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: Press #8 (P015)

Activity Description: Compression molding of sheet molding compound (SMC) and associated milling operations

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #8	OAC rule 3745-31-05 (PTI #03-13087)	See sections A.I.2.b, A.I.2.c, A.I.2.e and A.II.1 below.
	OAC rule 3745-31-05 (PTI #03-9135)	See A.I.2.f and g.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emission limitations for all compression sheet mold presses at the facility are based on the total amount of sheet molding compound (SMC) used on a daily and annual basis. Since it is infeasible for the permittee to track SMC usages for each individual press, the emission limitations are based on the maximum daily and annual usage of SMC in all the presses at the facility. (This tracking approach requires the permittee to accept OC emission limitations for presses #1, #2, #3, #4, #8, #12, #16, # 30, #31, and #32, Ohio EPA emissions units numbers P008, P009, P010, P011, P015, P019, P022, P023, P024, and P025, respectively, which were installed prior to January 1, 1974 and would normally be exempt from any mass OC emission limitation.)
- 2.b The permittee shall not emit more than 81.6 tons of OC per rolling, 365-day period from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.c The permittee shall not emit more than 11.7 tons of OC per rolling, 12-month period from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.
- 2.e The permittee shall not emit more than 652.4 pounds of OC per day from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.f The permittee shall not emit more than 2.4 pounds of OC per hour from this emissions unit. The 2.4 pounds per hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- 2.g The permittee shall not emit more than 2.0 tons of OC per month from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined.

II. Operational Restrictions

1. Total raw SMC usage in emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined, shall not exceed 186,400 lbs/day (93.2 tons/day) and 46.6 million lbs per rolling, 365-day period (23,300 tons per rolling, 365-day period).
2. The raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed, and placed in closed containers to will minimize volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for all the compression molding operations combined:
 - a. the total mass of raw SMC used in all compression molding presses, in tons;
 - b. the total mass of raw SMC that was preheated before use in the presses, in tons;
 - c. the total mass of raw SMC not preheated (a - b), in tons.
 - d. the rolling, 365-day SMC usage rate, in tons, for all compression molding presses [this is calculated by summing the raw SMC usage for the preceding 364 calendar days (from section 1.a above) + the raw SMC usage for the current calendar day];
 - e. the OC emission rate for all compression molding operations, calculated using the following formula:

$$E = (M1 \times F1) + (M2 \times F2)$$

where,

E = the daily OC emissions, in pounds

M1* = the mass of raw SMC used (with preheating) that day, in tons

M2* = the mass of raw SMC used (without preheating) that day, in tons

* not including scrap

F1 = an emission factor of 7 pounds OC per ton of raw SMC used (with preheating)

F2 = an emission factor of 4 pounds OC per ton of raw SMC used (without preheating); and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.

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

2. The permittee shall collect and record the following information each month for all the scrap generation operations combined:
 - a. the identification of each type of scrap SMC generated;
 - b. the mass, in pounds, of each type of scrap SMC generated;
 - c. the monomeric styrene content of each type of scrap SMC generated, in percent by weight;
 - d. the OC emission rate for each type of scrap SMC generated ($b \times c \times 0.4$)*, in tons;
 - e. the total OC emission rate for all the types of scrap SMC generated (summation of d for all types of scrap SMC generated), in tons; and
 - f. the rolling, 12-month OC emission rate for all the scrap generation operations, in tons.

* The 0.40 value is a company-supplied styrene volatilization emission factor.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day OC emission limitation of 81.6 tons for all compression molding operations;
 - b. all exceedances of the rolling, 12-month OC emission limitation of 11.7 tons for all scrap generation options;
 - c. all exceedances of the raw SMC usage restrictions of 186,400 pounds per day and 46.6 million pounds per rolling, 365-day period;
 - d. all exceedances of the daily OC emission limitation of 652.4 pounds all compression molding operations; and
 - e. all exceedances of the monthly OC emission limitation of 2.0 tons for all scrap generation options.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions, in tons, for the compression molding operations and scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined. These 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
81.6 tons OC per rolling, 365-day period (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
11.7 tons OC per rolling, 12-month period (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.c** Usage Restriction:
186,400 lbs raw SMC/day
46.6 million lbs raw SMC/rolling, 365-day period
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.d** Emission Limitation:
2.4 pounds of OC per hour
- Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly limitation above by multiplying the maximum daily SMC usage (8,727 pounds) by a company-supplied volatilization emission factor of 0.0055, and then dividing by 20.
- 1.e** Emission Limitation:
652.4 pounds of OC per day (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.f** Emission Limitation:
2.0 tons of OC per month (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 2.** Formulation data shall be used to determine the monomeric styrene content of the all scrap SMC 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #1	none	none

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: Press #9 (P016)

Activity Description: Compression molding of sheet molding compound (SMC) and associated milling operations

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #9	OAC rule 3745-31-05 (PTI #03-13087)	See sections A.I.2.b, A.I.2.c, A.I.2.e and A.II.1 below.
	OAC rule 3745-31-05 (PTI #03-9135)	See A.I.2.f and g.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emission limitations for all compression sheet mold presses at the facility are based on the total amount of sheet molding compound (SMC) used on a daily and annual basis. Since it is infeasible for the permittee to track SMC usages for each individual press, the emission limitations are based on the maximum daily and annual usage of SMC in all the presses at the facility. (This tracking approach requires the permittee to accept OC emission limitations for presses #1, #2, #3, #4, #8, #12, #16, # 30, #31, and #32, Ohio EPA emissions units numbers P008, P009, P010, P011, P015, P019, P022, P023, P024, and P025, respectively, which were installed prior to January 1, 1974 and would normally be exempt from any mass OC emission limitation.)
- 2.b The permittee shall not emit more than 81.6 tons of OC per rolling, 365-day period from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.c The permittee shall not emit more than 11.7 tons of OC per rolling, 12-month period from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.
- 2.e The permittee shall not emit more than 652.4 pounds of OC per day from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.f The permittee shall not emit more than 1.84 pounds of OC per hour from this emissions unit. The 1.84 pounds per hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- 2.g The permittee shall not emit more than 2.0 tons of OC per month from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined.

II. Operational Restrictions

1. Total raw SMC usage in emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined, shall not exceed 186,400 lbs/day (93.2 tons/day) and 46.6 million lbs per rolling, 365-day period (23,300 tons per rolling, 365-day period).
2. The raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed, and placed in closed containers to will minimize volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for all the compression molding operations combined:
 - a. the total mass of raw SMC used in all compression molding presses, in tons;
 - b. the total mass of raw SMC that was preheated before use in the presses, in tons;
 - c. the total mass of raw SMC not preheated (a - b), in tons.
 - d. the rolling, 365-day SMC usage rate, in tons, for all compression molding presses [this is calculated by summing the raw SMC usage for the preceding 364 calendar days (from section 1.a above) + the raw SMC usage for the current calendar day];
 - e. the OC emission rate for all compression molding operations, calculated using the following formula:

$$E = (M1 \times F1) + (M2 \times F2)$$

where,

E = the daily OC emissions, in pounds

M1* = the mass of raw SMC used (with preheating) that day, in tons

M2* = the mass of raw SMC used (without preheating) that day, in tons

* not including scrap

F1 = an emission factor of 7 pounds OC per ton of raw SMC used (with preheating)

F2 = an emission factor of 4 pounds OC per ton of raw SMC used (without preheating); and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.

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

2. The permittee shall collect and record the following information each month for all the scrap generation operations combined:
 - a. the identification of each type of scrap SMC generated;
 - b. the mass, in pounds, of each type of scrap SMC generated;
 - c. the monomeric styrene content of each type of scrap SMC generated, in percent by weight;
 - d. the OC emission rate for each type of scrap SMC generated ($b \times c \times 0.4$)*, in tons;
 - e. the total OC emission rate for all the types of scrap SMC generated (summation of d for all types of scrap SMC generated), in tons; and
 - f. the rolling, 12-month OC emission rate for all the scrap generation operations, in tons.

* The 0.40 value is a company-supplied styrene volatilization emission factor.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day OC emission limitation of 81.6 tons for all compression molding operations;
 - b. all exceedances of the rolling, 12-month OC emission limitation of 11.7 tons for all scrap generation options;
 - c. all exceedances of the raw SMC usage restrictions of 186,400 pounds per day and 46.6 million pounds per rolling, 365-day period;
 - d. all exceedances of the daily OC emission limitation of 652.4 pounds all compression molding operations; and
 - e. all exceedances of the monthly OC emission limitation of 2.0 tons for all scrap generation options.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions, in tons, for the compression molding operations and scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined. These 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
81.6 tons OC per rolling, 365-day period (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
11.7 tons OC per rolling, 12-month period (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.c** Usage Restriction:
186,400 lbs raw SMC/day
46.6 million lbs raw SMC/rolling, 365-day period
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.d** Emission Limitation:
1.84 pounds of OC per hour
- Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly limitation above by multiplying the maximum daily SMC usage (6,691 pounds) by a company-supplied volatilization emission factor of 0.0055, and then dividing by 20.
- 1.e** Emission Limitation:
652.4 pounds of OC per day (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.f** Emission Limitation:
2.0 tons of OC per month (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 2.** Formulation data shall be used to determine the monomeric styrene content of the all scrap SMC 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #1	none	none

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: Press #10 (P017)

Activity Description: Compression molding of sheet molding compound (SMC) and associated milling operations

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #10	OAC rule 3745-31-05 (PTI #03-13087)	See sections A.I.2.b, A.I.2.c, A.I.2.e and A.II.1 below.
	OAC rule 3745-31-05 (PTI #03-9135)	See A.I.2.f and g.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emission limitations for all compression sheet mold presses at the facility are based on the total amount of sheet molding compound (SMC) used on a daily and annual basis. Since it is infeasible for the permittee to track SMC usages for each individual press, the emission limitations are based on the maximum daily and annual usage of SMC in all the presses at the facility. (This tracking approach requires the permittee to accept OC emission limitations for presses #1, #2, #3, #4, #8, #12, #16, # 30, #31, and #32, Ohio EPA emissions units numbers P008, P009, P010, P011, P015, P019, P022, P023, P024, and P025, respectively, which were installed prior to January 1, 1974 and would normally be exempt from any mass OC emission limitation.)
- 2.b The permittee shall not emit more than 81.6 tons of OC per rolling, 365-day period from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.c The permittee shall not emit more than 11.7 tons of OC per rolling, 12-month period from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.
- 2.e The permittee shall not emit more than 652.4 pounds of OC per day from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.f The permittee shall not emit more than 1.6 pounds of OC per hour from this emissions unit. The 1.6 pounds per hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- 2.g The permittee shall not emit more than 2.0 tons of OC per month from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined.

II. Operational Restrictions

1. Total raw SMC usage in emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined, shall not exceed 186,400 lbs/day (93.2 tons/day) and 46.6 million lbs per rolling, 365-day period (23,300 tons per rolling, 365-day period).
2. The raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed, and placed in closed containers to will minimize volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for all the compression molding operations combined:
 - a. the total mass of raw SMC used in all compression molding presses, in tons;
 - b. the total mass of raw SMC that was preheated before use in the presses, in tons;
 - c. the total mass of raw SMC not preheated (a - b), in tons.
 - d. the rolling, 365-day SMC usage rate, in tons, for all compression molding presses [this is calculated by summing the raw SMC usage for the preceding 364 calendar days (from section 1.a above) + the raw SMC usage for the current calendar day];
 - e. the OC emission rate for all compression molding operations, calculated using the following formula:

$$E = (M1 \times F1) + (M2 \times F2)$$

where,

E = the daily OC emissions, in pounds

M1* = the mass of raw SMC used (with preheating) that day, in tons

M2* = the mass of raw SMC used (without preheating) that day, in tons

* not including scrap

F1 = an emission factor of 7 pounds OC per ton of raw SMC used (with preheating)

F2 = an emission factor of 4 pounds OC per ton of raw SMC used (without preheating); and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.

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

2. The permittee shall collect and record the following information each month for all the scrap generation operations combined:
 - a. the identification of each type of scrap SMC generated;
 - b. the mass, in pounds, of each type of scrap SMC generated;
 - c. the monomeric styrene content of each type of scrap SMC generated, in percent by weight;
 - d. the OC emission rate for each type of scrap SMC generated ($b \times c \times 0.4$)*, in tons;
 - e. the total OC emission rate for all the types of scrap SMC generated (summation of d for all types of scrap SMC generated), in tons; and
 - f. the rolling, 12-month OC emission rate for all the scrap generation operations, in tons.

* The 0.40 value is a company-supplied styrene volatilization emission factor.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day OC emission limitation of 81.6 tons for all compression molding operations;
 - b. all exceedances of the rolling, 12-month OC emission limitation of 11.7 tons for all scrap generation options;
 - c. all exceedances of the raw SMC usage restrictions of 186,400 pounds per day and 46.6 million pounds per rolling, 365-day period;
 - d. all exceedances of the daily OC emission limitation of 652.4 pounds all compression molding operations; and
 - e. all exceedances of the monthly OC emission limitation of 2.0 tons for all scrap generation options.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions, in tons, for the compression molding operations and scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined. These 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
81.6 tons OC per rolling, 365-day period (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
11.7 tons OC per rolling, 12-month period (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.c** Usage Restriction:
186,400 lbs raw SMC/day
46.6 million lbs raw SMC/rolling, 365-day period
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.d** Emission Limitation:
1.6 pounds of OC per hour
- Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly limitation above by multiplying the maximum daily SMC usage (5,818 pounds) by a company-supplied volatilization emission factor of 0.0055, and then dividing by 20.
- 1.e** Emission Limitation:
652.4 pounds of OC per day (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.f** Emission Limitation:
2.0 tons of OC per month (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 2.** Formulation data shall be used to determine the monomeric styrene content of the all scrap SMC 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #1	none	none

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: Press #11 (P018)

Activity Description: Compression molding of sheet molding compound (SMC) and associated milling operations

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #11	OAC rule 3745-31-05 (PTI #03-13087)	See sections A.I.2.b, A.I.2.c, A.I.2.e and A.II.1 below.
	OAC rule 3745-31-05 (PTI #03-9135)	See A.I.2.f and g.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emission limitations for all compression sheet mold presses at the facility are based on the total amount of sheet molding compound (SMC) used on a daily and annual basis. Since it is infeasible for the permittee to track SMC usages for each individual press, the emission limitations are based on the maximum daily and annual usage of SMC in all the presses at the facility. (This tracking approach requires the permittee to accept OC emission limitations for presses #1, #2, #3, #4, #8, #12, #16, # 30, #31, and #32, Ohio EPA emissions units numbers P008, P009, P010, P011, P015, P019, P022, P023, P024, and P025, respectively, which were installed prior to January 1, 1974 and would normally be exempt from any mass OC emission limitation.)
- 2.b The permittee shall not emit more than 81.6 tons of OC per rolling, 365-day period from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.c The permittee shall not emit more than 11.7 tons of OC per rolling, 12-month period from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.
- 2.e The permittee shall not emit more than 652.4 pounds of OC per day from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.f The permittee shall not emit more than 1.76 pounds of OC per hour from this emissions unit. The 1.76 pounds per hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- 2.g The permittee shall not emit more than 2.0 tons of OC per month from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined.

II. Operational Restrictions

1. Total raw SMC usage in emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined, shall not exceed 186,400 lbs/day (93.2 tons/day) and 46.6 million lbs per rolling, 365-day period (23,300 tons per rolling, 365-day period).
2. The raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed, and placed in closed containers to will minimize volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for all the compression molding operations combined:
 - a. the total mass of raw SMC used in all compression molding presses, in tons;
 - b. the total mass of raw SMC that was preheated before use in the presses, in tons;
 - c. the total mass of raw SMC not preheated (a - b), in tons.
 - d. the rolling, 365-day SMC usage rate, in tons, for all compression molding presses [this is calculated by summing the raw SMC usage for the preceding 364 calendar days (from section 1.a above) + the raw SMC usage for the current calendar day];
 - e. the OC emission rate for all compression molding operations, calculated using the following formula:

$$E = (M1 \times F1) + (M2 \times F2)$$

where,

E = the daily OC emissions, in pounds

M1* = the mass of raw SMC used (with preheating) that day, in tons

M2* = the mass of raw SMC used (without preheating) that day, in tons

* not including scrap

F1 = an emission factor of 7 pounds OC per ton of raw SMC used (with preheating)

F2 = an emission factor of 4 pounds OC per ton of raw SMC used (without preheating); and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.

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

2. The permittee shall collect and record the following information each month for all the scrap generation operations combined:
 - a. the identification of each type of scrap SMC generated;
 - b. the mass, in pounds, of each type of scrap SMC generated;
 - c. the monomeric styrene content of each type of scrap SMC generated, in percent by weight;
 - d. the OC emission rate for each type of scrap SMC generated ($b \times c \times 0.4$)*, in tons;
 - e. the total OC emission rate for all the types of scrap SMC generated (summation of d for all types of scrap SMC generated), in tons; and
 - f. the rolling, 12-month OC emission rate for all the scrap generation operations, in tons.

* The 0.40 value is a company-supplied styrene volatilization emission factor.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day OC emission limitation of 81.6 tons for all compression molding operations;
 - b. all exceedances of the rolling, 12-month OC emission limitation of 11.7 tons for all scrap generation options;
 - c. all exceedances of the raw SMC usage restrictions of 186,400 pounds per day and 46.6 million pounds per rolling, 365-day period;
 - d. all exceedances of the daily OC emission limitation of 652.4 pounds all compression molding operations; and
 - e. all exceedances of the monthly OC emission limitation of 2.0 tons for all scrap generation options.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions, in tons, for the compression molding operations and scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined. These 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
81.6 tons OC per rolling, 365-day period (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
11.7 tons OC per rolling, 12-month period (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.c** Usage Restriction:
186,400 lbs raw SMC/day
46.6 million lbs raw SMC/rolling, 365-day period
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.d** Emission Limitation:
1.76 pounds of OC per hour
- Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly limitation above by multiplying the maximum daily SMC usage (6,400 pounds) by a company-supplied volatilization emission factor of 0.0055, and then dividing by 20.
- 1.e** Emission Limitation:
652.4 pounds of OC per day (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.f** Emission Limitation:
2.0 tons of OC per month (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 2.** Formulation data shall be used to determine the monomeric styrene content of the all scrap SMC 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #1	none	none

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: Press #12 (P019)

Activity Description: Compression molding of sheet molding compound (SMC) and associated milling operations

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #12	OAC rule 3745-31-05 (PTI #03-13087)	See sections A.I.2.b, A.I.2.c, A.I.2.e and A.II.1 below.
	OAC rule 3745-31-05 (PTI #03-9135)	See A.I.2.f and g.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emission limitations for all compression sheet mold presses at the facility are based on the total amount of sheet molding compound (SMC) used on a daily and annual basis. Since it is infeasible for the permittee to track SMC usages for each individual press, the emission limitations are based on the maximum daily and annual usage of SMC in all the presses at the facility. (This tracking approach requires the permittee to accept OC emission limitations for presses #1, #2, #3, #4, #8, #12, #16, # 30, #31, and #32, Ohio EPA emissions units numbers P008, P009, P010, P011, P015, P019, P022, P023, P024, and P025, respectively, which were installed prior to January 1, 1974 and would normally be exempt from any mass OC emission limitation.)
- 2.b The permittee shall not emit more than 81.6 tons of OC per rolling, 365-day period from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.c The permittee shall not emit more than 11.7 tons of OC per rolling, 12-month period from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.
- 2.e The permittee shall not emit more than 652.4 pounds of OC per day from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.f The permittee shall not emit more than 3.28 pounds of OC per hour from this emissions unit. The 3.28 pounds per hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- 2.g The permittee shall not emit more than 2.0 tons of OC per month from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined.

II. Operational Restrictions

1. Total raw SMC usage in emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined, shall not exceed 186,400 lbs/day (93.2 tons/day) and 46.6 million lbs per rolling, 365-day period (23,300 tons per rolling, 365-day period).
2. The raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed, and placed in closed containers to will minimize volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for all the compression molding operations combined:
 - a. the total mass of raw SMC used in all compression molding presses, in tons;
 - b. the total mass of raw SMC that was preheated before use in the presses, in tons;
 - c. the total mass of raw SMC not preheated (a - b), in tons.
 - d. the rolling, 365-day SMC usage rate, in tons, for all compression molding presses [this is calculated by summing the raw SMC usage for the preceding 364 calendar days (from section 1.a above) + the raw SMC usage for the current calendar day];
 - e. the OC emission rate for all compression molding operations, calculated using the following formula:

$$E = (M1 \times F1) + (M2 \times F2)$$

where,

E = the daily OC emissions, in pounds

M1* = the mass of raw SMC used (with preheating) that day, in tons

M2* = the mass of raw SMC used (without preheating) that day, in tons

* not including scrap

F1 = an emission factor of 7 pounds OC per ton of raw SMC used (with preheating)

F2 = an emission factor of 4 pounds OC per ton of raw SMC used (without preheating); and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.

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

2. The permittee shall collect and record the following information each month for all the scrap generation operations combined:
 - a. the identification of each type of scrap SMC generated;
 - b. the mass, in pounds, of each type of scrap SMC generated;
 - c. the monomeric styrene content of each type of scrap SMC generated, in percent by weight;
 - d. the OC emission rate for each type of scrap SMC generated ($b \times c \times 0.4$)*, in tons;
 - e. the total OC emission rate for all the types of scrap SMC generated (summation of d for all types of scrap SMC generated), in tons; and
 - f. the rolling, 12-month OC emission rate for all the scrap generation operations, in tons.

* The 0.40 value is a company-supplied styrene volatilization emission factor.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day OC emission limitation of 81.6 tons for all compression molding operations;
 - b. all exceedances of the rolling, 12-month OC emission limitation of 11.7 tons for all scrap generation options;
 - c. all exceedances of the raw SMC usage restrictions of 186,400 pounds per day and 46.6 million pounds per rolling, 365-day period;
 - d. all exceedances of the daily OC emission limitation of 652.4 pounds all compression molding operations; and
 - e. all exceedances of the monthly OC emission limitation of 2.0 tons for all scrap generation options.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions, in tons, for the compression molding operations and scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined. These 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
81.6 tons OC per rolling, 365-day period (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
11.7 tons OC per rolling, 12-month period (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.c** Usage Restriction:
186,400 lbs raw SMC/day
46.6 million lbs raw SMC/rolling, 365-day period
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.d** Emission Limitation:
3.28 pounds of OC per hour
- Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly limitation above by multiplying the maximum daily SMC usage (11,930 pounds) by a company-supplied volatilization emission factor of 0.0055, and then dividing by 20.
- 1.e** Emission Limitation:
652.4 pounds of OC per day (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.f** Emission Limitation:
2.0 tons of OC per month (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 2.** Formulation data shall be used to determine the monomeric styrene content of the all scrap SMC 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #1	none	none

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: Press #14 (P020)

Activity Description: Compression molding of sheet molding compound (SMC) and associated milling operations

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #14	OAC rule 3745-31-05 (PTI #03-13087)	See sections A.I.2.b, A.I.2.c, A.I.2.e and A.II.1 below.
	OAC rule 3745-31-05 (PTI #03-9135)	See A.I.2.f and g.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emission limitations for all compression sheet mold presses at the facility are based on the total amount of sheet molding compound (SMC) used on a daily and annual basis. Since it is infeasible for the permittee to track SMC usages for each individual press, the emission limitations are based on the maximum daily and annual usage of SMC in all the presses at the facility. (This tracking approach requires the permittee to accept OC emission limitations for presses #1, #2, #3, #4, #8, #12, #16, # 30, #31, and #32, Ohio EPA emissions units numbers P008, P009, P010, P011, P015, P019, P022, P023, P024, and P025, respectively, which were installed prior to January 1, 1974 and would normally be exempt from any mass OC emission limitation.)
- 2.b The permittee shall not emit more than 81.6 tons of OC per rolling, 365-day period from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.c The permittee shall not emit more than 11.7 tons of OC per rolling, 12-month period from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.
- 2.e The permittee shall not emit more than 652.4 pounds of OC per day from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.f The permittee shall not emit more than 2.4 pounds of OC per hour from this emissions unit. The 2.4 pounds per hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- 2.g The permittee shall not emit more than 2.0 tons of OC per month from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined.

II. Operational Restrictions

1. Total raw SMC usage in emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined, shall not exceed 186,400 lbs/day (93.2 tons/day) and 46.6 million lbs per rolling, 365-day period (23,300 tons per rolling, 365-day period).
2. The raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed, and placed in closed containers to will minimize volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for all the compression molding operations combined:
 - a. the total mass of raw SMC used in all compression molding presses, in tons;
 - b. the total mass of raw SMC that was preheated before use in the presses, in tons;
 - c. the total mass of raw SMC not preheated (a - b), in tons.
 - d. the rolling, 365-day SMC usage rate, in tons, for all compression molding presses [this is calculated by summing the raw SMC usage for the preceding 364 calendar days (from section 1.a above) + the raw SMC usage for the current calendar day];
 - e. the OC emission rate for all compression molding operations, calculated using the following formula:

$$E = (M1 \times F1) + (M2 \times F2)$$

where,

E = the daily OC emissions, in pounds

M1* = the mass of raw SMC used (with preheating) that day, in tons

M2* = the mass of raw SMC used (without preheating) that day, in tons

* not including scrap

F1 = an emission factor of 7 pounds OC per ton of raw SMC used (with preheating)

F2 = an emission factor of 4 pounds OC per ton of raw SMC used (without preheating); and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.

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

2. The permittee shall collect and record the following information each month for all the scrap generation operations combined:
 - a. the identification of each type of scrap SMC generated;
 - b. the mass, in pounds, of each type of scrap SMC generated;
 - c. the monomeric styrene content of each type of scrap SMC generated, in percent by weight;
 - d. the OC emission rate for each type of scrap SMC generated ($b \times c \times 0.4$)*, in tons;
 - e. the total OC emission rate for all the types of scrap SMC generated (summation of d for all types of scrap SMC generated), in tons; and
 - f. the rolling, 12-month OC emission rate for all the scrap generation operations, in tons.

* The 0.40 value is a company-supplied styrene volatilization emission factor.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day OC emission limitation of 81.6 tons for all compression molding operations;
 - b. all exceedances of the rolling, 12-month OC emission limitation of 11.7 tons for all scrap generation options;
 - c. all exceedances of the raw SMC usage restrictions of 186,400 pounds per day and 46.6 million pounds per rolling, 365-day period;
 - d. all exceedances of the daily OC emission limitation of 652.4 pounds all compression molding operations; and
 - e. all exceedances of the monthly OC emission limitation of 2.0 tons for all scrap generation options.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions, in tons, for the compression molding operations and scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined. These 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
81.6 tons OC per rolling, 365-day period (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
11.7 tons OC per rolling, 12-month period (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.c** Usage Restriction:
186,400 lbs raw SMC/day
46.6 million lbs raw SMC/rolling, 365-day period
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.d** Emission Limitation:
2.4 pounds of OC per hour
- Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly limitation above by multiplying the maximum daily SMC usage (8,727 pounds) by a company-supplied volatilization emission factor of 0.0055, and then dividing by 20.
- 1.e** Emission Limitation:
652.4 pounds of OC per day (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.f** Emission Limitation:
2.0 tons of OC per month (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 2.** Formulation data shall be used to determine the monomeric styrene content of the all scrap SMC 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #1	none	none

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: Press #15 (P021)

Activity Description: Compression molding of sheet molding compound (SMC) and associated milling operations

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #15	OAC rule 3745-31-05 (PTI #03-13087)	See sections A.I.2.b, A.I.2.c, A.I.2.e and A.II.1 below.
	OAC rule 3745-31-05 (PTI #03-9135)	See A.I.2.f and g.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emission limitations for all compression sheet mold presses at the facility are based on the total amount of sheet molding compound (SMC) used on a daily and annual basis. Since it is infeasible for the permittee to track SMC usages for each individual press, the emission limitations are based on the maximum daily and annual usage of SMC in all the presses at the facility. (This tracking approach requires the permittee to accept OC emission limitations for presses #1, #2, #3, #4, #8, #12, #16, # 30, #31, and #32, Ohio EPA emissions units numbers P008, P009, P010, P011, P015, P019, P022, P023, P024, and P025, respectively, which were installed prior to January 1, 1974 and would normally be exempt from any mass OC emission limitation.)
- 2.b The permittee shall not emit more than 81.6 tons of OC per rolling, 365-day period from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.c The permittee shall not emit more than 11.7 tons of OC per rolling, 12-month period from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.
- 2.e The permittee shall not emit more than 652.4 pounds of OC per day from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.f The permittee shall not emit more than 2.4 pounds of OC per hour from this emissions unit. The 2.4 pounds per hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- 2.g The permittee shall not emit more than 2.0 tons of OC per month from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined.

II. Operational Restrictions

1. Total raw SMC usage in emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined, shall not exceed 186,400 lbs/day (93.2 tons/day) and 46.6 million lbs per rolling, 365-day period (23,300 tons per rolling, 365-day period).
2. The raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed, and placed in closed containers to will minimize volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for all the compression molding operations combined:
 - a. the total mass of raw SMC used in all compression molding presses, in tons;
 - b. the total mass of raw SMC that was preheated before use in the presses, in tons;
 - c. the total mass of raw SMC not preheated (a - b), in tons.
 - d. the rolling, 365-day SMC usage rate, in tons, for all compression molding presses [this is calculated by summing the raw SMC usage for the preceding 364 calendar days (from section 1.a above) + the raw SMC usage for the current calendar day];
 - e. the OC emission rate for all compression molding operations, calculated using the following formula:

$$E = (M1 \times F1) + (M2 \times F2)$$

where,

E = the daily OC emissions, in pounds

M1* = the mass of raw SMC used (with preheating) that day, in tons

M2* = the mass of raw SMC used (without preheating) that day, in tons

* not including scrap

F1 = an emission factor of 7 pounds OC per ton of raw SMC used (with preheating)

F2 = an emission factor of 4 pounds OC per ton of raw SMC used (without preheating); and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.

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

2. The permittee shall collect and record the following information each month for all the scrap generation operations combined:
 - a. the identification of each type of scrap SMC generated;
 - b. the mass, in pounds, of each type of scrap SMC generated;
 - c. the monomeric styrene content of each type of scrap SMC generated, in percent by weight;
 - d. the OC emission rate for each type of scrap SMC generated ($b \times c \times 0.4$)*, in tons;
 - e. the total OC emission rate for all the types of scrap SMC generated (summation of d for all types of scrap SMC generated), in tons; and
 - f. the rolling, 12-month OC emission rate for all the scrap generation operations, in tons.

* The 0.40 value is a company-supplied styrene volatilization emission factor.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day OC emission limitation of 81.6 tons for all compression molding operations;
 - b. all exceedances of the rolling, 12-month OC emission limitation of 11.7 tons for all scrap generation options;
 - c. all exceedances of the raw SMC usage restrictions of 186,400 pounds per day and 46.6 million pounds per rolling, 365-day period;
 - d. all exceedances of the daily OC emission limitation of 652.4 pounds all compression molding operations; and
 - e. all exceedances of the monthly OC emission limitation of 2.0 tons for all scrap generation options.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions, in tons, for the compression molding operations and scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined. These 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
81.6 tons OC per rolling, 365-day period (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
11.7 tons OC per rolling, 12-month period (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

- 1.c** Usage Restriction:
186,400 lbs raw SMC/day
46.6 million lbs raw SMC/rolling, 365-day period

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

- 1.d** Emission Limitation:
2.4 pounds of OC per hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly limitation above by multiplying the maximum daily SMC usage (8,727 pounds) by a company-supplied volatilization emission factor of 0.0055, and then dividing by 20.

- 1.e** Emission Limitation:
652.4 pounds of OC per day (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

- 1.f** Emission Limitation:
2.0 tons of OC per month (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

- 2.** Formulation data shall be used to determine the monomeric styrene content of the all scrap SMC 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #15	none	none

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: Press #16 (P022)

Activity Description: Compression molding of sheet molding compound (SMC) and associated milling operations

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #16	OAC rule 3745-31-05 (PTI #03-13087)	See sections A.I.2.b, A.I.2.c, A.I.2.e and A.II.1 below.
	OAC rule 3745-31-05 (PTI #03-9135)	See A.I.2.f and g.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emission limitations for all compression sheet mold presses at the facility are based on the total amount of sheet molding compound (SMC) used on a daily and annual basis. Since it is infeasible for the permittee to track SMC usages for each individual press, the emission limitations are based on the maximum daily and annual usage of SMC in all the presses at the facility. (This tracking approach requires the permittee to accept OC emission limitations for presses #1, #2, #3, #4, #8, #12, #16, # 30, #31, and #32, Ohio EPA emissions units numbers P008, P009, P010, P011, P015, P019, P022, P023, P024, and P025, respectively, which were installed prior to January 1, 1974 and would normally be exempt from any mass OC emission limitation.)
- 2.b The permittee shall not emit more than 81.6 tons of OC per rolling, 365-day period from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.c The permittee shall not emit more than 11.7 tons of OC per rolling, 12-month period from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.
- 2.e The permittee shall not emit more than 652.4 pounds of OC per day from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.f The permittee shall not emit more than 1.2 pounds of OC per hour from this emissions unit. The 1.2 pounds per hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- 2.g The permittee shall not emit more than 2.0 tons of OC per month from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined.

II. Operational Restrictions

1. Total raw SMC usage in emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined, shall not exceed 186,400 lbs/day (93.2 tons/day) and 46.6 million lbs per rolling, 365-day period (23,300 tons per rolling, 365-day period).
2. The raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed, and placed in closed containers to will minimize volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for all the compression molding operations combined:
 - a. the total mass of raw SMC used in all compression molding presses, in tons;
 - b. the total mass of raw SMC that was preheated before use in the presses, in tons;
 - c. the total mass of raw SMC not preheated (a - b), in tons.
 - d. the rolling, 365-day SMC usage rate, in tons, for all compression molding presses [this is calculated by summing the raw SMC usage for the preceding 364 calendar days (from section 1.a above) + the raw SMC usage for the current calendar day];
 - e. the OC emission rate for all compression molding operations, calculated using the following formula:

$$E = (M1 \times F1) + (M2 \times F2)$$

where,

E = the daily OC emissions, in pounds

M1* = the mass of raw SMC used (with preheating) that day, in tons

M2* = the mass of raw SMC used (without preheating) that day, in tons

* not including scrap

F1 = an emission factor of 7 pounds OC per ton of raw SMC used (with preheating)

F2 = an emission factor of 4 pounds OC per ton of raw SMC used (without preheating); and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.

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

2. The permittee shall collect and record the following information each month for all the scrap generation operations combined:
 - a. the identification of each type of scrap SMC generated;
 - b. the mass, in pounds, of each type of scrap SMC generated;
 - c. the monomeric styrene content of each type of scrap SMC generated, in percent by weight;
 - d. the OC emission rate for each type of scrap SMC generated ($b \times c \times 0.4$)*, in tons;
 - e. the total OC emission rate for all the types of scrap SMC generated (summation of d for all types of scrap SMC generated), in tons; and
 - f. the rolling, 12-month OC emission rate for all the scrap generation operations, in tons.

* The 0.40 value is a company-supplied styrene volatilization emission factor.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day OC emission limitation of 81.6 tons for all compression molding operations;
 - b. all exceedances of the rolling, 12-month OC emission limitation of 11.7 tons for all scrap generation options;
 - c. all exceedances of the raw SMC usage restrictions of 186,400 pounds per day and 46.6 million pounds per rolling, 365-day period;
 - d. all exceedances of the daily OC emission limitation of 652.4 pounds all compression molding operations; and
 - e. all exceedances of the monthly OC emission limitation of 2.0 tons for all scrap generation options.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions, in tons, for the compression molding operations and scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined. These 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
81.6 tons OC per rolling, 365-day period (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
11.7 tons OC per rolling, 12-month period (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.c** Usage Restriction:
186,400 lbs raw SMC/day
46.6 million lbs raw SMC/rolling, 365-day period
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.d** Emission Limitation:
1.2 pounds of OC per hour
- Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly limitation above by multiplying the maximum daily SMC usage (4,364 pounds) by a company-supplied volatilization emission factor of 0.0055, and then dividing by 20.
- 1.e** Emission Limitation:
652.4 pounds of OC per day (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.f** Emission Limitation:
2.0 tons of OC per month (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 2.** Formulation data shall be used to determine the monomeric styrene content of the all scrap SMC 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #16	none	none

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: Press #30 (P023)

Activity Description: Compression molding of sheet molding compound (SMC) and associated milling operations

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #30	OAC rule 3745-31-05 (PTI #03-13087)	See sections A.I.2.b, A.I.2.c, A.I.2.e and A.II.1 below.
	OAC rule 3745-31-05 (PTI #03-9135)	See A.I.2.f and g.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emission limitations for all compression sheet mold presses at the facility are based on the total amount of sheet molding compound (SMC) used on a daily and annual basis. Since it is infeasible for the permittee to track SMC usages for each individual press, the emission limitations are based on the maximum daily and annual usage of SMC in all the presses at the facility. (This tracking approach requires the permittee to accept OC emission limitations for presses #1, #2, #3, #4, #8, #12, #16, # 30, #31, and #32, Ohio EPA emissions units numbers P008, P009, P010, P011, P015, P019, P022, P023, P024, and P025, respectively, which were installed prior to January 1, 1974 and would normally be exempt from any mass OC emission limitation.)
- 2.b The permittee shall not emit more than 81.6 tons of OC per rolling, 365-day period from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.c The permittee shall not emit more than 11.7 tons of OC per rolling, 12-month period from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.
- 2.e The permittee shall not emit more than 652.4 pounds of OC per day from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.f The permittee shall not emit more than 0.44 pounds of OC per hour from this emissions unit. The 0.44 pounds per hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- 2.g The permittee shall not emit more than 2.0 tons of OC per month from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined.

II. Operational Restrictions

1. Total raw SMC usage in emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined, shall not exceed 186,400 lbs/day (93.2 tons/day) and 46.6 million lbs per rolling, 365-day period (23,300 tons per rolling, 365-day period).
2. The raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed, and placed in closed containers to will minimize volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for all the compression molding operations combined:
 - a. the total mass of raw SMC used in all compression molding presses, in tons;
 - b. the total mass of raw SMC that was preheated before use in the presses, in tons;
 - c. the total mass of raw SMC not preheated (a - b), in tons.
 - d. the rolling, 365-day SMC usage rate, in tons, for all compression molding presses [this is calculated by summing the raw SMC usage for the preceding 364 calendar days (from section 1.a above) + the raw SMC usage for the current calendar day];
 - e. the OC emission rate for all compression molding operations, calculated using the following formula:

$$E = (M1 \times F1) + (M2 \times F2)$$

where,

E = the daily OC emissions, in pounds

M1* = the mass of raw SMC used (with preheating) that day, in tons

M2* = the mass of raw SMC used (without preheating) that day, in tons

* not including scrap

F1 = an emission factor of 7 pounds OC per ton of raw SMC used (with preheating)

F2 = an emission factor of 4 pounds OC per ton of raw SMC used (without preheating); and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.

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

2. The permittee shall collect and record the following information each month for all the scrap generation operations combined:
 - a. the identification of each type of scrap SMC generated;
 - b. the mass, in pounds, of each type of scrap SMC generated;
 - c. the monomeric styrene content of each type of scrap SMC generated, in percent by weight;
 - d. the OC emission rate for each type of scrap SMC generated ($b \times c \times 0.4$)*, in tons;
 - e. the total OC emission rate for all the types of scrap SMC generated (summation of d for all types of scrap SMC generated), in tons; and
 - f. the rolling, 12-month OC emission rate for all the scrap generation operations, in tons.

* The 0.40 value is a company-supplied styrene volatilization emission factor.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day OC emission limitation of 81.6 tons for all compression molding operations;
 - b. all exceedances of the rolling, 12-month OC emission limitation of 11.7 tons for all scrap generation options;
 - c. all exceedances of the raw SMC usage restrictions of 186,400 pounds per day and 46.6 million pounds per rolling, 365-day period;
 - d. all exceedances of the daily OC emission limitation of 652.4 pounds all compression molding operations; and
 - e. all exceedances of the monthly OC emission limitation of 2.0 tons for all scrap generation options.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions, in tons, for the compression molding operations and scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined. These 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
81.6 tons OC per rolling, 365-day period (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
11.7 tons OC per rolling, 12-month period (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.c** Usage Restriction:
186,400 lbs raw SMC/day
46.6 million lbs raw SMC/rolling, 365-day period
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.d** Emission Limitation:
0.44 pounds of OC per hour
- Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly limitation above by multiplying the maximum daily SMC usage (4,364 pounds) by a company-supplied volatilization emission factor of 0.0055, and then dividing by 20.
- 1.e** Emission Limitation:
652.4 pounds of OC per day (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.f** Emission Limitation:
2.0 tons of OC per month (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 2.** Formulation data shall be used to determine the monomeric styrene content of the all scrap SMC 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #30	none	none

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: Press #31 (P024)

Activity Description: Compression molding of sheet molding compound (SMC) and associated milling operations

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #31	OAC rule 3745-31-05 (PTI #03-13087)	See sections A.I.2.b, A.I.2.c, A.I.2.e and A.II.1 below.
	OAC rule 3745-31-05 (PTI #03-9135)	See A.I.2.f and g.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emission limitations for all compression sheet mold presses at the facility are based on the total amount of sheet molding compound (SMC) used on a daily and annual basis. Since it is infeasible for the permittee to track SMC usages for each individual press, the emission limitations are based on the maximum daily and annual usage of SMC in all the presses at the facility. (This tracking approach requires the permittee to accept OC emission limitations for presses #1, #2, #3, #4, #8, #12, #16, # 30, #31, and #32, Ohio EPA emissions units numbers P008, P009, P010, P011, P015, P019, P022, P023, P024, and P025, respectively, which were installed prior to January 1, 1974 and would normally be exempt from any mass OC emission limitation.)
- 2.b The permittee shall not emit more than 81.6 tons of OC per rolling, 365-day period from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.c The permittee shall not emit more than 11.7 tons of OC per rolling, 12-month period from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.
- 2.e The permittee shall not emit more than 652.4 pounds of OC per day from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.f The permittee shall not emit more than 0.44 pounds of OC per hour from this emissions unit. The 0.44 pounds per hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- 2.g The permittee shall not emit more than 2.0 tons of OC per month from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined.

II. Operational Restrictions

1. Total raw SMC usage in emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined, shall not exceed 186,400 lbs/day (93.2 tons/day) and 46.6 million lbs per rolling, 365-day period (23,300 tons per rolling, 365-day period).
2. The raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed, and placed in closed containers to will minimize volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for all the compression molding operations combined:
 - a. the total mass of raw SMC used in all compression molding presses, in tons;
 - b. the total mass of raw SMC that was preheated before use in the presses, in tons;
 - c. the total mass of raw SMC not preheated (a - b), in tons.
 - d. the rolling, 365-day SMC usage rate, in tons, for all compression molding presses [this is calculated by summing the raw SMC usage for the preceding 364 calendar days (from section 1.a above) + the raw SMC usage for the current calendar day];
 - e. the OC emission rate for all compression molding operations, calculated using the following formula:

$$E = (M1 \times F1) + (M2 \times F2)$$

where,

E = the daily OC emissions, in pounds

M1* = the mass of raw SMC used (with preheating) that day, in tons

M2* = the mass of raw SMC used (without preheating) that day, in tons

* not including scrap

F1 = an emission factor of 7 pounds OC per ton of raw SMC used (with preheating)

F2 = an emission factor of 4 pounds OC per ton of raw SMC used (without preheating); and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.

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

2. The permittee shall collect and record the following information each month for all the scrap generation operations combined:
 - a. the identification of each type of scrap SMC generated;
 - b. the mass, in pounds, of each type of scrap SMC generated;
 - c. the monomeric styrene content of each type of scrap SMC generated, in percent by weight;
 - d. the OC emission rate for each type of scrap SMC generated ($b \times c \times 0.4$)*, in tons;
 - e. the total OC emission rate for all the types of scrap SMC generated (summation of d for all types of scrap SMC generated), in tons; and
 - f. the rolling, 12-month OC emission rate for all the scrap generation operations, in tons.

* The 0.40 value is a company-supplied styrene volatilization emission factor.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day OC emission limitation of 81.6 tons for all compression molding operations;
 - b. all exceedances of the rolling, 12-month OC emission limitation of 11.7 tons for all scrap generation options;
 - c. all exceedances of the raw SMC usage restrictions of 186,400 pounds per day and 46.6 million pounds per rolling, 365-day period;
 - d. all exceedances of the daily OC emission limitation of 652.4 pounds all compression molding operations; and
 - e. all exceedances of the monthly OC emission limitation of 2.0 tons for all scrap generation options.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions, in tons, for the compression molding operations and scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined. These 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
81.6 tons OC per rolling, 365-day period (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
11.7 tons OC per rolling, 12-month period (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.c** Usage Restriction:
186,400 lbs raw SMC/day
46.6 million lbs raw SMC/rolling, 365-day period
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.d** Emission Limitation:
0.44 pounds of OC per hour
- Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly limitation above by multiplying the maximum daily SMC usage (4,364 pounds) by a company-supplied volatilization emission factor of 0.0055, and then dividing by 20.
- 1.e** Emission Limitation:
652.4 pounds of OC per day (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.f** Emission Limitation:
2.0 tons of OC per month (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 2.** Formulation data shall be used to determine the monomeric styrene content of the all scrap SMC 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #31	none	none

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: Press #32 (P025)

Activity Description: Compression molding of sheet molding compound (SMC) and associated milling operations

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #32	OAC rule 3745-31-05 (PTI #03-13087)	See sections A.I.2.b, A.I.2.c, A.I.2.e and A.II.1 below.
	OAC rule 3745-31-05 (PTI #03-9135)	See A.I.2.f and g.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emission limitations for all compression sheet mold presses at the facility are based on the total amount of sheet molding compound (SMC) used on a daily and annual basis. Since it is infeasible for the permittee to track SMC usages for each individual press, the emission limitations are based on the maximum daily and annual usage of SMC in all the presses at the facility. (This tracking approach requires the permittee to accept OC emission limitations for presses #1, #2, #3, #4, #8, #12, #16, # 30, #31, and #32, Ohio EPA emissions units numbers P008, P009, P010, P011, P015, P019, P022, P023, P024, and P025, respectively, which were installed prior to January 1, 1974 and would normally be exempt from any mass OC emission limitation.)
- 2.b The permittee shall not emit more than 81.6 tons of OC per rolling, 365-day period from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.c The permittee shall not emit more than 11.7 tons of OC per rolling, 12-month period from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.
- 2.e The permittee shall not emit more than 652.4 pounds of OC per day from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.f The permittee shall not emit more than 0.44 pounds of OC per hour from this emissions unit. The 0.44 pounds per hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- 2.g The permittee shall not emit more than 2.0 tons of OC per month from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined.

II. Operational Restrictions

1. Total raw SMC usage in emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined, shall not exceed 186,400 lbs/day (93.2 tons/day) and 46.6 million lbs per rolling, 365-day period (23,300 tons per rolling, 365-day period).
2. The raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed, and placed in closed containers to will minimize volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for all the compression molding operations combined:
 - a. the total mass of raw SMC used in all compression molding presses, in tons;
 - b. the total mass of raw SMC that was preheated before use in the presses, in tons;
 - c. the total mass of raw SMC not preheated (a - b), in tons.
 - d. the rolling, 365-day SMC usage rate, in tons, for all compression molding presses [this is calculated by summing the raw SMC usage for the preceding 364 calendar days (from section 1.a above) + the raw SMC usage for the current calendar day];
 - e. the OC emission rate for all compression molding operations, calculated using the following formula:

$$E = (M1 \times F1) + (M2 \times F2)$$

where,

E = the daily OC emissions, in pounds

M1* = the mass of raw SMC used (with preheating) that day, in tons

M2* = the mass of raw SMC used (without preheating) that day, in tons

* not including scrap

F1 = an emission factor of 7 pounds OC per ton of raw SMC used (with preheating)

F2 = an emission factor of 4 pounds OC per ton of raw SMC used (without preheating); and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.

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

2. The permittee shall collect and record the following information each month for all the scrap generation operations combined:
 - a. the identification of each type of scrap SMC generated;
 - b. the mass, in pounds, of each type of scrap SMC generated;
 - c. the monomeric styrene content of each type of scrap SMC generated, in percent by weight;
 - d. the OC emission rate for each type of scrap SMC generated (b x c x 0.4)*, in tons;
 - e. the total OC emission rate for all the types of scrap SMC generated (summation of d for all types of scrap SMC generated), in tons; and
 - f. the rolling, 12-month OC emission rate for all the scrap generation operations, in tons.

* The 0.40 value is a company-supplied styrene volatilization emission factor.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day OC emission limitation of 81.6 tons for all compression molding operations;
 - b. all exceedances of the rolling, 12-month OC emission limitation of 11.7 tons for all scrap generation options;
 - c. all exceedances of the raw SMC usage restrictions of 186,400 pounds per day and 46.6 million pounds per rolling, 365-day period;
 - d. all exceedances of the daily OC emission limitation of 652.4 pounds all compression molding operations; and
 - e. all exceedances of the monthly OC emission limitation of 2.0 tons for all scrap generation options.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions, in tons, for the compression molding operations and scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined. These 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
81.6 tons OC per rolling, 365-day period (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
11.7 tons OC per rolling, 12-month period (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.c** Usage Restriction:
186,400 lbs raw SMC/day
46.6 million lbs raw SMC/rolling, 365-day period
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.d** Emission Limitation:
0.44 pounds of OC per hour
- Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly limitation above by multiplying the maximum daily SMC usage (4,364 pounds) by a company-supplied volatilization emission factor of 0.0055, and then dividing by 20.
- 1.e** Emission Limitation:
652.4 pounds of OC per day (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.f** Emission Limitation:
2.0 tons of OC per month (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 2.** Formulation data shall be used to determine the monomeric styrene content of the all scrap SMC 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #32	none	none

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: Press #18 (P033)

Activity Description: Compression molding of sheet molding compound (SMC)

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #18	OAC rule 3745-31-05 (PTI #03-13087)	See sections A.I.2.b, A.I.2.c, A.I.2.e and A.II.1 below.
	OAC rule 3745-31-05 (PTI #03-9135)	See A.I.2.f and g.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emission limitations for all compression sheet mold presses at the facility are based on the total amount of sheet molding compound (SMC) used on a daily and annual basis. Since it is infeasible for the permittee to track SMC usages for each individual press, the emission limitations are based on the maximum daily and annual usage of SMC in all the presses at the facility. (This tracking approach requires the permittee to accept OC emission limitations for presses #1, #2, #3, #4, #8, #12, #16, # 30, #31, and #32, Ohio EPA emissions units numbers P008, P009, P010, P011, P015, P019, P022, P023, P024, and P025, respectively, which were installed prior to January 1, 1974 and would normally be exempt from any mass OC emission limitation.)
- 2.b The permittee shall not emit more than 81.6 tons of OC per rolling, 365-day period from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.c The permittee shall not emit more than 11.7 tons of OC per rolling, 12-month period from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.
- 2.e The permittee shall not emit more than 652.4 pounds of OC per day from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.f The permittee shall not emit more than 1.75 pounds of OC per hour from this emissions unit. The 1.75 pounds per hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- 2.g The permittee shall not emit more than 2.0 tons of OC per month from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined.

II. Operational Restrictions

1. Total raw SMC usage in emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined, shall not exceed 186,400 lbs/day (93.2 tons/day) and 46.6 million lbs per rolling, 365-day period (23,300 tons per rolling, 365-day period).
2. The raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed, and placed in closed containers to will minimize volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for all the compression molding operations combined:
 - a. the total mass of raw SMC used in all compression molding presses, in tons;
 - b. the total mass of raw SMC that was preheated before use in the presses, in tons;
 - c. the total mass of raw SMC not preheated (a - b), in tons.
 - d. the rolling, 365-day SMC usage rate, in tons, for all compression molding presses [this is calculated by summing the raw SMC usage for the preceding 364 calendar days (from section 1.a above) + the raw SMC usage for the current calendar day];
 - e. the OC emission rate for all compression molding operations, calculated using the following formula:

$$E = (M1 \times F1) + (M2 \times F2)$$

where,

E = the daily OC emissions, in pounds

M1* = the mass of raw SMC used (with preheating) that day, in tons

M2* = the mass of raw SMC used (without preheating) that day, in tons

* not including scrap

F1 = an emission factor of 7 pounds OC per ton of raw SMC used (with preheating)

F2 = an emission factor of 4 pounds OC per ton of raw SMC used (without preheating); and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.

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

2. The permittee shall collect and record the following information each month for all the scrap generation operations combined:
 - a. the identification of each type of scrap SMC generated;
 - b. the mass, in pounds, of each type of scrap SMC generated;
 - c. the monomeric styrene content of each type of scrap SMC generated, in percent by weight;
 - d. the OC emission rate for each type of scrap SMC generated ($b \times c \times 0.4$)*, in tons;
 - e. the total OC emission rate for all the types of scrap SMC generated (summation of d for all types of scrap SMC generated), in tons; and
 - f. the rolling, 12-month OC emission rate for all the scrap generation operations, in tons.

* The 0.40 value is a company-supplied styrene volatilization emission factor.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day OC emission limitation of 81.6 tons for all compression molding operations;
 - b. all exceedances of the rolling, 12-month OC emission limitation of 11.7 tons for all scrap generation options;
 - c. all exceedances of the raw SMC usage restrictions of 186,400 pounds per day and 46.6 million pounds per rolling, 365-day period;
 - d. all exceedances of the daily OC emission limitation of 652.4 pounds all compression molding operations; and
 - e. all exceedances of the monthly OC emission limitation of 2.0 tons for all scrap generation options.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions, in tons, for the compression molding operations and scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined. These 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
81.6 tons OC per rolling, 365-day period (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
11.7 tons OC per rolling, 12-month period (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

- 1.c** Usage Restriction:
186,400 lbs raw SMC/day
46.6 million lbs raw SMC/rolling, 365-day period

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

- 1.d** Emission Limitation:
1.75 pounds of OC per hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly limitation above by multiplying the maximum daily SMC usage (6,360 pounds) by a company-supplied volatilization emission factor of 0.0055, and then dividing by 20.

- 1.e** Emission Limitation:
652.4 pounds of OC per day (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

- 1.f** Emission Limitation:
2.0 tons of OC per month (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

- 2.** Formulation data shall be used to determine the monomeric styrene content of the all scrap SMC materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #18	OAC rule 3745-31-05 (PTI #03-13087)	See B.II.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- This permit allows the use of materials (sheet molding compounds) specified by the permittee in the permit to install application (PTI #03-13087) for this emissions unit. In addition to this emissions unit, emissions unit P034 was included in the modeling for air toxics since it emits the same pollutant and was part of the permit to install application. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: styrene
 TLV (ug/m3): 85,200
 Maximum Hourly Emission Rate: 3.5
 Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 175.0
 MAGLC (ug/m3): 2023.8

- OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - changes in the composition of the materials used, 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 specified in the above table;
 - changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

II. Operational Restrictions (continued)

3. Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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: Press #19 (P034)

Activity Description: Compression molding of sheet molding compound (SMC)

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #19	OAC rule 3745-31-05 (PTI #03-13087)	See sections A.I.2.b, A.I.2.c, A.I.2.e and A.II.1 below.
	OAC rule 3745-31-05 (PTI #03-9135)	See A.I.2.f and g.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emission limitations for all compression sheet mold presses at the facility are based on the total amount of sheet molding compound (SMC) used on a daily and annual basis. Since it is infeasible for the permittee to track SMC usages for each individual press, the emission limitations are based on the maximum daily and annual usage of SMC in all the presses at the facility. (This tracking approach requires the permittee to accept OC emission limitations for presses #1, #2, #3, #4, #8, #12, #16, # 30, #31, and #32, Ohio EPA emissions units numbers P008, P009, P010, P011, P015, P019, P022, P023, P024, and P025, respectively, which were installed prior to January 1, 1974 and would normally be exempt from any mass OC emission limitation.)
- 2.b The permittee shall not emit more than 81.6 tons of OC per rolling, 365-day period from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.c The permittee shall not emit more than 11.7 tons of OC per rolling, 12-month period from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.
- 2.e The permittee shall not emit more than 652.4 pounds of OC per day from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined.
- 2.f The permittee shall not emit more than 1.75 pounds of OC per hour from this emissions unit. The 1.75 pounds per hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- 2.g The permittee shall not emit more than 2.0 tons of OC per month from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined.

II. Operational Restrictions

1. Total raw SMC usage in emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined, shall not exceed 186,400 lbs/day (93.2 tons/day) and 46.6 million lbs per rolling, 365-day period (23,300 tons per rolling, 365-day period).
2. The raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed, and placed in closed containers to will minimize volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for all the compression molding operations combined:
 - a. the total mass of raw SMC used in all compression molding presses, in tons;
 - b. the total mass of raw SMC that was preheated before use in the presses, in tons;
 - c. the total mass of raw SMC not preheated (a - b), in tons.
 - d. the rolling, 365-day SMC usage rate, in tons, for all compression molding presses [this is calculated by summing the raw SMC usage for the preceding 364 calendar days (from section 1.a above) + the raw SMC usage for the current calendar day];
 - e. the OC emission rate for all compression molding operations, calculated using the following formula:

$$E = (M1 \times F1) + (M2 \times F2)$$

where,

E = the daily OC emissions, in pounds

M1* = the mass of raw SMC used (with preheating) that day, in tons

M2* = the mass of raw SMC used (without preheating) that day, in tons

* not including scrap

F1 = an emission factor of 7 pounds OC per ton of raw SMC used (with preheating)

F2 = an emission factor of 4 pounds OC per ton of raw SMC used (without preheating); and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.

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

2. The permittee shall collect and record the following information each month for all the scrap generation operations combined:
 - a. the identification of each type of scrap SMC generated;
 - b. the mass, in pounds, of each type of scrap SMC generated;
 - c. the monomeric styrene content of each type of scrap SMC generated, in percent by weight;
 - d. the OC emission rate for each type of scrap SMC generated ($b \times c \times 0.4$)*, in tons;
 - e. the total OC emission rate for all the types of scrap SMC generated (summation of d for all types of scrap SMC generated), in tons; and
 - f. the rolling, 12-month OC emission rate for all the scrap generation operations, in tons.

* The 0.40 value is a company-supplied styrene volatilization emission factor.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day OC emission limitation of 81.6 tons for all compression molding operations;
 - b. all exceedances of the rolling, 12-month OC emission limitation of 11.7 tons for all scrap generation options;
 - c. all exceedances of the raw SMC usage restrictions of 186,400 pounds per day and 46.6 million pounds per rolling, 365-day period;
 - d. all exceedances of the daily OC emission limitation of 652.4 pounds all compression molding operations; and
 - e. all exceedances of the monthly OC emission limitation of 2.0 tons for all scrap generation options.
2. The permittee shall submit annual reports that summarize the actual annual OC emissions, in tons, for the compression molding operations and scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined. These 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
81.6 tons OC per rolling, 365-day period (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
11.7 tons OC per rolling, 12-month period (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.c** Usage Restriction:
186,400 lbs raw SMC/day
46.6 million lbs raw SMC/rolling, 365-day period
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.d** Emission Limitation:
1.75 pounds of OC per hour
- Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly limitation above by multiplying the maximum daily SMC usage (6,360 pounds) by a company-supplied volatilization emission factor of 0.0055, and then dividing by 20.
- 1.e** Emission Limitation:
652.4 pounds of OC per day (from the compression molding operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P033, and P034 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 1.f** Emission Limitation:
2.0 tons of OC per month (from the scrap generation operations associated with emissions units P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, and P025 combined).
- Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping required pursuant to Section A.III of the terms and conditions of this permit.
- 2.** Formulation data shall be used to determine the monomeric styrene content of the all scrap SMC materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #19	OAC rule 3745-31-05 (PTI #03-13087)	See B.II.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- This permit allows the use of materials (sheet molding compounds) specified by the permittee in the permit to install application (PTI #03-13087) for this emissions unit. In addition to this emissions unit, emissions unit P034 was included in the modeling for air toxics since it emits the same pollutant and was part of the permit to install application. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: styrene
 TLV (ug/m3): 85,200
 Maximum Hourly Emission Rate: 3.5
 Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 175.0
 MAGLC (ug/m3): 2023.8

- OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - changes in the composition of the materials used, 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 specified in the above table;
 - changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

II. Operational Restrictions (continued)

3. Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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: Secondary Finishing Operations (P901)

Activity Description: Secondary finishing (deflashing, sanding, routing, drilling, milling, trimming) operations

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
secondary finishing operation of fiberglass reinforced plastic parts, with 3 baghouses	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	8.98 lbs PE/hr
	OAC rule 3745-17-07(B)	Visible fugitive emissions shall not exceed 20% opacity, as a three-minute average.
	OAC rule 3745-17-08(B)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a The permittee shall employ reasonably available control measures (RACM) to control the PE from the secondary finishing operations not captured and controlled by the baghouse system. Enclosure of the secondary finishing operations within facility buildings satisfies the RACM requirement for this emissions unit.

II. Operational Restrictions

- The pressure drop across each baghouse (Spencer North, Spencer South, and Spencer East) shall be maintained within the range of 2 to 12 inches of water while the emissions unit is in operation.
- The permittee shall perform all secondary finishing operations within facility building enclosures.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drops across the baghouses (Spencer North, Spencer South, and Spencer East) while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual. The permittee shall record the pressure drops across the baghouses for this emissions unit on a daily basis.

IV. Reporting Requirements

- The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across each baghouse did not comply with the allowable range specified above.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

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

Applicable Compliance Method:
OAC rule 3745-17-03(B)(1)

1.b Emission Limitation:
8.98 lbs PE/hr

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance by testing in accordance with OAC rule 3745-17-03(B)(10).

1.c Emission Limitation:
20 % opacity, as a three-minute average

Applicable Compliance Method:
OAC rule 3745-17-03(B)(3)

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
secondary finishing operation of fiberglass reinforced plastic parts, with 3 baghouses	OAC rule 3745-31-05 (PTI #03-13221)	stack emissions: 0.60 lb PE/hr 2.63 tons PE/yr 0.004 gr/dscf fugitive emissions: 3.77 tons PE/yr See B.I.2.b.

2. Additional Terms and Conditions

- 2.a The permittee shall employ the baghouses at all times to control the PE from this emissions unit.
- 2.b The limitation of 3.77 tons PE per year is established for PTI purposes and reflects the emissions unit's potential to emit. Therefore, no record keeping and reporting are necessary to ensure compliance with this limitation

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

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

- 1.a Emission Limitation:
0.60 lb PE/hr and 2.63 TPY PE (stack emissions)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

Compliance with the annual limitation is assumed as long as compliance with the hourly limitation is maintained (the annual emission limitation was calculated by multiplying the hourly limitation by 8760 and dividing by 2000).

V. Testing Requirements (continued)

1.b Emission Limitation:
3.77 TPY PE (fugitive emissions)

Applicable Compliance Method:

The permittee shall demonstrate compliance by multiplying an emission factor of 2.58×10^{-8} lb PE/cubic foot of ventilation air* by a volumetric flow rate of 33,300,000 cubic feet/year, and then dividing by 2000.

* This emission factor was submitted by the permittee, and it was derived from actual emission testing conducted for this emissions unit.

1.c Emission Limitation:
0.004 gr/dscf (stack emissions)

Applicable Compliance Method:

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

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth #1 (R005)
Activity Description: Primer Paint Spray Booth #1

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth #1, with water wash and baffles	OAC rule 3745-21-07(G)	None, see A.II.1.
	OAC rule 3745-17-07(A)	20% opacity, as a 6-minute average, except as provided by rule
	OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall not employ any material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
- The permittee shall operate the water wash and baffles at all times while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall maintain the following information each day for this emissions unit:
 - the company identification for each coating and/or cleanup material employed; and
 - documentation on whether or not each coating and/or cleanup material employed is a photochemically reactive material.
- The permittee shall maintain daily records that document any time periods when the water wash and baffles were not in service when the emissions unit was in operation.

IV. Reporting Requirements

- The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the water wash and baffles were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.

IV. Reporting Requirements (continued)

2. The permittee shall submit deviation (excursion) reports that identify each day during which a photochemically reactive material was employed. Each report shall be submitted within 45 days after the deviation occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in the Applicable Emission Limitations and/or Control Requirements of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

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

- 1.b Emission Limitation:
PE shall not exceed 0.551 pound per hour

Applicable Compliance Method:

To determine the actual worst case emission rate for particulates, the following equation shall be used:

$$E = (M) \times (1-TE) \times (1-CE)$$

where:

E = particulate matter emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.60 considering 40 CFR Part 60.453)

CE = control efficiency of the control equipment (90% for the water wash and baffles)

[If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) term for each additional piece of equipment.]

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

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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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: Paint Booth #2 (R006)
Activity Description: Primer Paint Spray Booth #2

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth #2, with water wash and baffles	OAC rule 3745-21-07(G)	None, see A.II.1.
	OAC rule 3745-17-07(A)	20% opacity, as a 6-minute average, except as provided by rule
	OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall not employ any material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
- The permittee shall operate the water wash and baffles at all times while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall maintain the following information each day for this emissions unit:
 - the company identification for each coating and/or cleanup material employed; and
 - documentation on whether or not each coating and/or cleanup material employed is a photochemically reactive material.
- The permittee shall maintain daily records that document any time periods when the water wash and baffles were not in service when the emissions unit was in operation.

IV. Reporting Requirements

- The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the water wash and baffles were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.

IV. Reporting Requirements (continued)

2. The permittee shall submit deviation (excursion) reports that identify each day during which a photochemically reactive material was employed. Each report shall be submitted within 45 days after the deviation occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in the Applicable Emission Limitations and/or Control Requirements of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

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

- 1.b Emission Limitation:
PE shall not exceed 0.551 pound per hour

Applicable Compliance Method:

To determine the actual worst case emission rate for particulates, the following equation shall be used:

$$E = (M) \times (1-TE) \times (1-CE)$$

where:

E = particulate matter emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.60 considering 40 CFR Part 60.453)

CE = control efficiency of the control equipment (90% for the water wash and baffles)

[If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) term for each additional piece of equipment.]

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

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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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: Paint Booth #3 (R007)
Activity Description: Primer Paint Spray Booth #3

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth #3, with water wash and baffles	OAC rule 3745-21-07(G)	None, see A.II.1.
	OAC rule 3745-17-07(A)	20% opacity, as a 6-minute average, except as provided by rule
	OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall not employ any material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall operate the water wash and baffles at all times while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following information each day for this emissions unit:
 - a. the company identification for each coating and/or cleanup material employed; and
 - b. documentation on whether or not each coating and/or cleanup material employed is a photochemically reactive material.
2. The permittee shall maintain daily records that document any time periods when the water wash and baffles were not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the water wash and baffles were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.

IV. Reporting Requirements (continued)

2. The permittee shall submit deviation (excursion) reports that identify each day during which a photochemically reactive material was employed. Each report shall be submitted within 45 days after the deviation occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in the Applicable Emission Limitations and/or Control Requirements of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

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

- 1.b Emission Limitation:
PE shall not exceed 0.551 pound per hour

Applicable Compliance Method:

To determine the actual worst case emission rate for particulates, the following equation shall be used:

$$E = (M) \times (1-TE) \times (1-CE)$$

where:

E = particulate matter emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.60 considering 40 CFR Part 60.453)

CE = control efficiency of the control equipment (90% for the water wash and baffles)

[If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) term for each additional piece of equipment.]

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

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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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: Paint Booth #4 (R008)
Activity Description: Primer Paint Spray Booth #4

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth #4, with water wash and baffles	OAC rule 3745-21-07(G)	None, see A.II.1.
	OAC rule 3745-17-07(A)	20% opacity, as a 6-minute average, except as provided by rule
	OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall not employ any material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
- The permittee shall operate the water wash and baffles at all times while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall maintain the following information each day for this emissions unit:
 - the company identification for each coating and/or cleanup material employed; and
 - documentation on whether or not each coating and/or cleanup material employed is a photochemically reactive material.
- The permittee shall maintain daily records that document any time periods when the water wash and baffles were not in service when the emissions unit was in operation.

IV. Reporting Requirements

- The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the water wash and baffles were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.

IV. Reporting Requirements (continued)

2. The permittee shall submit deviation (excursion) reports that identify each day during which a photochemically reactive material was employed. Each report shall be submitted within 45 days after the deviation occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in the Applicable Emission Limitations and/or Control Requirements of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

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

- 1.b Emission Limitation:
PE shall not exceed 0.551 pound per hour

Applicable Compliance Method:

To determine the actual worst case emission rate for particulates, the following equation shall be used:

$$E = (M) \times (1-TE) \times (1-CE)$$

where:

E = particulate matter emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.60 considering 40 CFR Part 60.453)

CE = control efficiency of the control equipment (90% for the water wash and baffles)

[If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) term for each additional piece of equipment.]

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

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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