



State of Ohio Environmental Protection Agency

Street Address:

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Columbus, OH 43216-1049

07/30/99

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

03-87-00-0042
The Budd Company Plastics Division, North Baltimore
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,

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

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



Ohio EPA

State of Ohio Environmental Protection Agency

TITLE V PERMIT

Issue Date: 07/30/99

DRAFT

Effective Date:

Expiration Date:

This document constitutes issuance to:

The Budd Company Plastics Division, North Baltimore
100 South Poe Road
P.O. Box 277
North Baltimore, OH 45872

of a Title V permit for Facility ID: 03-87-00-0042

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

P009 (Press Area #1)

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

P010 (Press Area #2)

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

P011 (Press Area #3)

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

P013 (Press Area #5)

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

P014 (Press Area #6)

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

P015 (Press Area #7)

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

P016 (Press Area #8)

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

P017 (Press Area #9)

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

P018 (Press Area #10)

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

P019 (Press Area #11)

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

P020 (Press Area #12)

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

P021 (Press Area #13)

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

P022 (Press Area #14)

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

P023 (Press Area #15)

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

P024 (Press Area #25)

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

P026 (Press Area #19)

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

P027 (Press Area #20)

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

P028 (Press Area #21)

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

P029 (Press Area #22)

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

P030 (Press Area #23)

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

P031 (Press Area #4)

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

P032 (Press Area #24)

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

P901 (Secondary Finishing Operations)

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

R012 (Paint Booth #1)

Primer Spray Booth #1

R013 (Paint Booth #2)

Primer Spray Booth #2

R014 (Paint Booth #3)

Primer Spray Booth #3

R015 (Paint Booth #4)

Primer 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 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.8 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 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.

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 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.

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 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 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. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. 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).

6. 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.

7. 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.

8. 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 this facility:

B001 - 4.2 mmBtu/hr natural gas/propane boiler (Boiler #1);
B002 - 4.2 mmBtu/hr natural gas/propane boiler (Boiler #2);
B003 - 7.3 mmBtu/hr natural gas/propane boiler (Boiler #3);
B004 - Air Make Up #1 (5.6 mmBtu/hr);
B005 - Air Make Up #2 (4.5 mmBtu/hr);
B006 - Air Make Up #3 (5.6 mmBtu/hr);
B007 - Air Make Up #4 (6.3 mmBtu/hr);
P006 - Primer System Dry Off Oven;
P007 - Primer System Bake Oven;
P008 - Heated Plastic Parts Washer;
Z001 - Bonding Area A (adhesive removal/cleaning);
Z002 - Bonding Area B (adhesive removal/cleaning);
Z003 - Bonding Area C (adhesive removal/cleaning);
Z004 - Bonding Area D (adhesive removal/cleaning);
Z005 - Bonding Area E (adhesive removal/cleaning);
Z006 - Bonding Area F (adhesive removal/cleaning);
Z007 - Bonding Area G (adhesive removal/cleaning);
Z008 - Bonding Area H (adhesive removal/cleaning);
Z009 - Edge Seal #1 (edge sealer application);
Z010 - Paint Inspection and Touch Up Area A;
Z011 - Paint Inspection and Touch Up Area B;
Z012 - Paint Inspection and Touch Up Area C;
Z013 - Paint Inspection and Touch Up Area D;
Z014 - Paint Inspection and Touch Up Area E;
Z015 - Paint Inspection and Touch Up Area F;
Z016 - Paint Inspection and Touch Up Area G;
Z017 - Paint Inspection and Touch Up Area H;
Z018 - Paint Mix Room;
Z019 - Tech Mix Room (touch up paint mixing/cleanup);
Z020 - RRIM Clamp Area A (molding operation);
Z021 - RRIM Clamp Area B (molding operation);
Z022 - RRIM Clamp Area C (molding operation);
Z023 - RRIM Clamp Area D (molding operation);
Z024 - RRIM Clamp Area E (molding operation);
Z025 - RRIM Clamp Area F (molding operation); and
Z026 - RRIM Clamp Area G (molding operation).

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 Area #1 (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 #1	OAC rule 3745-31-05 (PTI 03-9858)	See Sections A.I.2.b, A.I.2.c, and A.II.1 below.

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 impossible for the permittee to track SMC usage 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, #5, #6 and #12, Ohio EPA emissions units numbers P009, P010, P013, P014, and P020, 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 73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 combined.
- 2.c The permittee shall not emit more than 41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

II. Operational Restrictions

1. Raw SMC usage in emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 shall not exceed a combined total of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period).
2. The permittee shall collect raw scrap SMC at the end of every shift, and weigh and place it in a closed container that will minimize the volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for all compression molding operations:
 - a. the total mass (pounds/day) of raw SMC used in all compression molding presses;
 - b. the total mass (pounds/day) of raw SMC that was preheated before use in the presses;
 - c. the total mass (pounds/day) of raw SMC not preheated (a - b).
 - d. the rolling, 365-day SMC usage rate for all compression molding presses;
 - e. the OC emission rate for all compression molding operations calculated using the following formula:

E = the summation of (M)(F) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

E = the daily OC emissions, in pounds

M = the mass of raw SMC used that day, in tons (not including scrap)

F = emission factor in pounds OC per ton of raw SMC used in each of the above emissions units as follows:

7.00 pounds of OC per ton with preheating

4.00 pounds of OC per ton without preheating; and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.
2. The permittee shall collect and record the following information for each day for all scrap generation operations:
 - a. the permittee's identification of each type of scrap SMC generated;
 - b. the monomer content of each type of scrap SMC generated;
 - c. the weight in pounds of each type of scrap SMC generated; and
 - d. the total mass (tons/day) of scrap SMC generated.

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

3. The permittee shall collect and record the following information for each month for all scrap generation operations:
 - a. the total mass (tons/month) of scrap SMC generated;
 - b. the calculated average styrene content for all scrap SMC generated;
 - c. the OC emission rate for scrap SMC generation operations calculated using the following formula:

$E = \text{the summation of } (M)(T)(F) \text{ for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;}$

where,

$E = \text{the monthly OC emissions, in tons}$

$M = \text{the monthly amount of scrap generated, in tons}$

$T = \text{the average styrene content, in percent by weight, expressed as ton(s) of styrene per ton(s) of SMC}$

$F = 0.40 \text{ (company-supplied styrene volatilization emission factor); and}$

- d. the rolling, 12-month OC emission rate from the scrap generation operations associated with all of the compression molding operations at the facility, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations and/or usage restrictions:
 - a. the 73.4 tons of OC per year emission limitation, as a rolling, 365-day summation, for all compression molding operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;
 - b. the 41.9 tons of OC per year emission limitation, as a rolling, 12-month summation, for all scrap generation operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032; and
 - c. the raw SMC usage restrictions of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032.

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 exceedance occurs.

2. The permittee shall submit annual reports which summarize the actual annual OC emissions for the compression molding operations and associated scrap generation operations, in tons, for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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 shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.b Emission Limitation:
41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

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	OAC rule 3745-31-05 (PTI 03-9078)	See Sections B.I.2.a and B.I.2.b below.
	OAC rule 3745-31-05 (PTI 03-9858)	See Section B.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall not emit more than 1.98 pounds of OC per hour from this emissions unit. The 1.98 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.b The permittee shall not emit more than 5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.
- 2.c The permittee shall not emit more than 587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations:
 - a. the 587.3 pounds of OC per day emission limitation from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined; and
 - b. the 5.0 tons of OC per month emission limitation from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.

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 exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
The permittee shall not emit more than 1.98 pounds of OC per hour from this emissions unit.

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit. The potential to emit for this emissions unit was based on a maximum SMC daily usage of 7200 pounds per day, a company-supplied OC volatilization emission factor of 0.0055, and an operating rate of 20 hours per day.

- 1.b** Emission Limitation:
587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 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** Emission Limitation:
5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press Area #2 (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 #2	OAC rule 3745-31-05 (PTI 03-9858)	See Sections A.I.2.b, A.I.2.c, and A.II.1 below.

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 impossible for the permittee to track SMC usage 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, #5, #6 and #12, Ohio EPA emissions units numbers P009, P010, P013, P014, and P020, 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 73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 combined.
- 2.c The permittee shall not emit more than 41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

II. Operational Restrictions

1. Raw SMC usage in emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 shall not exceed a combined total of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period).
2. The permittee shall collect raw scrap SMC at the end of every shift, and weigh and place it in a closed container that will minimize the volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for all compression molding operations:
 - a. the total mass (pounds/day) of raw SMC used in all compression molding presses;
 - b. the total mass (pounds/day) of raw SMC that was preheated before use in the presses;
 - c. the total mass (pounds/day) of raw SMC not preheated (a - b).
 - d. the rolling, 365-day SMC usage rate for all compression molding presses;
 - e. the OC emission rate for all compression molding operations calculated using the following formula:

E = the summation of (M)(F) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

E = the daily OC emissions, in pounds

M = the mass of raw SMC used that day, in tons (not including scrap)

F = emission factor in pounds OC per ton of raw SMC used in each of the above emissions units as follows:

7.00 pounds of OC per ton with preheating

4.00 pounds of OC per ton without preheating; and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.
2. The permittee shall collect and record the following information for each day for all scrap generation operations:
 - a. the permittee's identification of each type of scrap SMC generated;
 - b. the monomer content of each type of scrap SMC generated;
 - c. the weight in pounds of each type of scrap SMC generated; and
 - d. the total mass (tons/day) of scrap SMC generated.

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

3. The permittee shall collect and record the following information for each month for all scrap generation operations:
 - a. the total mass (tons/month) of scrap SMC generated;
 - b. the calculated average styrene content for all scrap SMC generated;
 - c. the OC emission rate for scrap SMC generation operations calculated using the following formula:

$E = \text{the summation of } (M)(T)(F) \text{ for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;}$

where,

$E = \text{the monthly OC emissions, in tons}$

$M = \text{the monthly amount of scrap generated, in tons}$

$T = \text{the average styrene content, in percent by weight, expressed as ton(s) of styrene per ton(s) of SMC}$

$F = 0.40 \text{ (company-supplied styrene volatilization emission factor); and}$

- d. the rolling, 12-month OC emission rate from the scrap generation operations associated with all of the compression molding operations at the facility, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations and/or usage restrictions:
 - a. the 73.4 tons of OC per year emission limitation, as a rolling, 365-day summation, for all compression molding operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;
 - b. the 41.9 tons of OC per year emission limitation, as a rolling, 12-month summation, for all scrap generation operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032; and
 - c. the raw SMC usage restrictions of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032.

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 exceedance occurs.

2. The permittee shall submit annual reports which summarize the actual annual OC emissions for the compression molding operations and associated scrap generation operations, in tons, for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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 shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.b Emission Limitation:
41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

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	OAC rule 3745-31-05 (PTI 03-9078)	See Sections B.I.2.a and B.I.2.b below.
	OAC rule 3745-31-05 (PTI 03-9858)	See Section B.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall not emit more than 1.98 pounds of OC per hour from this emissions unit. The 1.98 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.b The permittee shall not emit more than 5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.
- 2.c The permittee shall not emit more than 587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations:
 - a. the 587.3 pounds of OC per day emission limitation from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined; and
 - b. the 5.0 tons of OC per month emission limitation from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.

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 exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
The permittee shall not emit more than 1.98 pounds of OC per hour from this emissions unit.

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit. The potential to emit for this emissions unit was based on a maximum SMC daily usage of 7200 pounds per day, a company-supplied OC volatilization emission factor of 0.0055, and an operating rate of 20 hours per day.

- 1.b** Emission Limitation:
587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 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** Emission Limitation:
5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press Area #3 (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 #3	OAC rule 3745-31-05 (PTI 03-9858)	See Sections A.I.2.b, A.I.2.c, and A.II.1 below.

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 impossible for the permittee to track SMC usage 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, #5, #6 and #12, Ohio EPA emissions units numbers P009, P010, P013, P014, and P020, 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 73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 combined.
- 2.c The permittee shall not emit more than 41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

II. Operational Restrictions

1. Raw SMC usage in emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 shall not exceed a combined total of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period).
2. The permittee shall collect raw scrap SMC at the end of every shift, and weigh and place it in a closed container that will minimize the volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for all compression molding operations:
 - a. the total mass (pounds/day) of raw SMC used in all compression molding presses;
 - b. the total mass (pounds/day) of raw SMC that was preheated before use in the presses;
 - c. the total mass (pounds/day) of raw SMC not preheated (a - b).
 - d. the rolling, 365-day SMC usage rate for all compression molding presses;
 - e. the OC emission rate for all compression molding operations calculated using the following formula:

E = the summation of (M)(F) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

E = the daily OC emissions, in pounds

M = the mass of raw SMC used that day, in tons (not including scrap)

F = emission factor in pounds OC per ton of raw SMC used in each of the above emissions units as follows:

7.00 pounds of OC per ton with preheating

4.00 pounds of OC per ton without preheating; and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.
2. The permittee shall collect and record the following information for each day for all scrap generation operations:
 - a. the permittee's identification of each type of scrap SMC generated;
 - b. the monomer content of each type of scrap SMC generated;
 - c. the weight in pounds of each type of scrap SMC generated; and
 - d. the total mass (tons/day) of scrap SMC generated.

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

3. The permittee shall collect and record the following information for each month for all scrap generation operations:
 - a. the total mass (tons/month) of scrap SMC generated;
 - b. the calculated average styrene content for all scrap SMC generated;
 - c. the OC emission rate for scrap SMC generation operations calculated using the following formula:

$E = \text{the summation of } (M)(T)(F) \text{ for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;}$

where,

$E = \text{the monthly OC emissions, in tons}$

$M = \text{the monthly amount of scrap generated, in tons}$

$T = \text{the average styrene content, in percent by weight, expressed as ton(s) of styrene per ton(s) of SMC}$

$F = 0.40 \text{ (company-supplied styrene volatilization emission factor); and}$

- d. the rolling, 12-month OC emission rate from the scrap generation operations associated with all of the compression molding operations at the facility, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations and/or usage restrictions:
 - a. the 73.4 tons of OC per year emission limitation, as a rolling, 365-day summation, for all compression molding operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;
 - b. the 41.9 tons of OC per year emission limitation, as a rolling, 12-month summation, for all scrap generation operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032; and
 - c. the raw SMC usage restrictions of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032.

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 exceedance occurs.

2. The permittee shall submit annual reports which summarize the actual annual OC emissions for the compression molding operations and associated scrap generation operations, in tons, for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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 shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.b Emission Limitation:
41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

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	OAC rule 3745-31-05 (PTI 03-9078)	See Sections B.I.2.a and B.I.2.b below.
	OAC rule 3745-31-05 (PTI 03-9858)	See Section B.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall not emit more than 3.19 pounds of OC per hour from this emissions unit. The 3.19 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.b The permittee shall not emit more than 5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.
- 2.c The permittee shall not emit more than 587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined.

II. Operational Restrictions

1. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application (PTI #03-9078) for this emissions unit. In addition to this emissions unit, emissions units P015, P026, P027, P028, P029, P030, and P031 were included in the modeling for air toxics since they emit the same pollutant and were 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): 213,000
 Maximum Hourly Emission Rate: 13.5
 Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 345.8
 MAGLC (ug/m3): 5070.0

II. Operational Restrictions (continued)

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":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. 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);
- c. 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
- d. 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.

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

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations:
 - a. the 587.3 pounds of OC per day emission limitation from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined; and
 - b. the 5.0 tons of OC per month emission limitation from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.

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 exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
The permittee shall not emit more than 3.19 pounds of OC per hour from this emissions unit.

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit. The potential to emit for this emissions unit was based on a maximum SMC daily usage of 11600 pounds per day, a company-supplied OC volatilization emission factor of 0.0055, and an operating rate of 20 hours per day.

- 1.b Emission Limitation:
587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 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 Emission Limitation:
5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press Area #5 (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

- 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 03-9858)	See Sections A.I.2.b, A.I.2.c, and A.II.1 below.

2. Additional Terms and Conditions

- 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 impossible for the permittee to track SMC usage 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, #5, #6 and #12, Ohio EPA emissions units numbers P009, P010, P013, P014, and P020, respectively, which were installed prior to January 1, 1974 and would normally be exempt from any mass OC emission limitation.
- The permittee shall not emit more than 73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 combined.
- The permittee shall not emit more than 41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 combined.
- 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.

II. Operational Restrictions

- Raw SMC usage in emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 shall not exceed a combined total of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period).
- The permittee shall collect raw scrap SMC at the end of every shift, and weigh and place it in a closed container that will minimize the volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for all compression molding operations:
 - a. the total mass (pounds/day) of raw SMC used in all compression molding presses;
 - b. the total mass (pounds/day) of raw SMC that was preheated before use in the presses;
 - c. the total mass (pounds/day) of raw SMC not preheated (a - b).
 - d. the rolling, 365-day SMC usage rate for all compression molding presses;
 - e. the OC emission rate for all compression molding operations calculated using the following formula:

E = the summation of (M)(F) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

E = the daily OC emissions, in pounds

M = the mass of raw SMC used that day, in tons (not including scrap)

F = emission factor in pounds OC per ton of raw SMC used in each of the above emissions units as follows:

7.00 pounds of OC per ton with preheating

4.00 pounds of OC per ton without preheating; and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.
2. The permittee shall collect and record the following information for each day for all scrap generation operations:
 - a. the permittee's identification of each type of scrap SMC generated;
 - b. the monomer content of each type of scrap SMC generated;
 - c. the weight in pounds of each type of scrap SMC generated; and
 - d. the total mass (tons/day) of scrap SMC generated.

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

3. The permittee shall collect and record the following information for each month for all scrap generation operations:
 - a. the total mass (tons/month) of scrap SMC generated;
 - b. the calculated average styrene content for all scrap SMC generated;
 - c. the OC emission rate for scrap SMC generation operations calculated using the following formula:

$E = \text{the summation of } (M)(T)(F) \text{ for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;}$

where,

$E = \text{the monthly OC emissions, in tons}$

$M = \text{the monthly amount of scrap generated, in tons}$

$T = \text{the average styrene content, in percent by weight, expressed as ton(s) of styrene per ton(s) of SMC}$

$F = 0.40 \text{ (company-supplied styrene volatilization emission factor); and}$

- d. the rolling, 12-month OC emission rate from the scrap generation operations associated with all of the compression molding operations at the facility, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations and/or usage restrictions:
 - a. the 73.4 tons of OC per year emission limitation, as a rolling, 365-day summation, for all compression molding operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;
 - b. the 41.9 tons of OC per year emission limitation, as a rolling, 12-month summation, for all scrap generation operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032; and
 - c. the raw SMC usage restrictions of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032.

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 exceedance occurs.

2. The permittee shall submit annual reports which summarize the actual annual OC emissions for the compression molding operations and associated scrap generation operations, in tons, for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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 shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.b Emission Limitation:
41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

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	OAC rule 3745-31-05 (PTI 03-9078)	See Sections B.I.2.a and B.I.2.b below.
	OAC rule 3745-31-05 (PTI 03-9858)	See Section B.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall not emit more than 1.65 pounds of OC per hour from this emissions unit. The 1.65 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.b The permittee shall not emit more than 5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.
- 2.c The permittee shall not emit more than 587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations:
 - a. the 587.3 pounds of OC per day emission limitation from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined; and
 - b. the 5.0 tons of OC per month emission limitation from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.

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 exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:

The permittee shall not emit more than 1.98 pounds of OC per hour from this emissions unit.

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit. The potential to emit for this emissions unit was based on a maximum SMC daily usage of 7200 pounds per day, a company-supplied OC volatilization emission factor of 0.0055, and an operating rate of 20 hours per day.

1.b Emission Limitation:

587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 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 Emission Limitation:

5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press Area #6 (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

- 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 03-9858)	See Sections A.I.2.b, A.I.2.c, and A.II.1 below.

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 impossible for the permittee to track SMC usage 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, #5, #6 and #12, Ohio EPA emissions units numbers P009, P010, P013, P014, and P020, 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 73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 combined.
- 2.c** The permittee shall not emit more than 41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

II. Operational Restrictions

- Raw SMC usage in emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 shall not exceed a combined total of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period).
- The permittee shall collect raw scrap SMC at the end of every shift, and weigh and place it in a closed container that will minimize the volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for all compression molding operations:
 - a. the total mass (pounds/day) of raw SMC used in all compression molding presses;
 - b. the total mass (pounds/day) of raw SMC that was preheated before use in the presses;
 - c. the total mass (pounds/day) of raw SMC not preheated (a - b).
 - d. the rolling, 365-day SMC usage rate for all compression molding presses;
 - e. the OC emission rate for all compression molding operations calculated using the following formula:

E = the summation of (M)(F) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

E = the daily OC emissions, in pounds

M = the mass of raw SMC used that day, in tons (not including scrap)

F = emission factor in pounds OC per ton of raw SMC used in each of the above emissions units as follows:

7.00 pounds of OC per ton with preheating

4.00 pounds of OC per ton without preheating; and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.
2. The permittee shall collect and record the following information for each day for all scrap generation operations:
 - a. the permittee's identification of each type of scrap SMC generated;
 - b. the monomer content of each type of scrap SMC generated;
 - c. the weight in pounds of each type of scrap SMC generated; and
 - d. the total mass (tons/day) of scrap SMC generated.

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

3. The permittee shall collect and record the following information for each month for all scrap generation operations:
 - a. the total mass (tons/month) of scrap SMC generated;
 - b. the calculated average styrene content for all scrap SMC generated;
 - c. the OC emission rate for scrap SMC generation operations calculated using the following formula:

$E = \text{the summation of } (M)(T)(F) \text{ for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;}$

where,

$E = \text{the monthly OC emissions, in tons}$

$M = \text{the monthly amount of scrap generated, in tons}$

$T = \text{the average styrene content, in percent by weight, expressed as ton(s) of styrene per ton(s) of SMC}$

$F = 0.40 \text{ (company-supplied styrene volatilization emission factor); and}$

- d. the rolling, 12-month OC emission rate from the scrap generation operations associated with all of the compression molding operations at the facility, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations and/or usage restrictions:
 - a. the 73.4 tons of OC per year emission limitation, as a rolling, 365-day summation, for all compression molding operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;
 - b. the 41.9 tons of OC per year emission limitation, as a rolling, 12-month summation, for all scrap generation operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032; and
 - c. the raw SMC usage restrictions of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032.

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 exceedance occurs.

2. The permittee shall submit annual reports which summarize the actual annual OC emissions for the compression molding operations and associated scrap generation operations, in tons, for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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 shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.b Emission Limitation:
41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

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	OAC rule 3745-31-05 (PTI 03-9078)	See Sections B.I.2.a and B.I.2.b below.
	OAC rule 3745-31-05 (PTI 03-9858)	See Section B.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall not emit more than 1.54 pounds of OC per hour from this emissions unit. The 1.54 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.b The permittee shall not emit more than 5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.
- 2.c The permittee shall not emit more than 587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations:
 - a. the 587.3 pounds of OC per day emission limitation from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined; and
 - b. the 5.0 tons of OC per month emission limitation from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.

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 exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
The permittee shall not emit more than 1.98 pounds of OC per hour from this emissions unit.

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit. The potential to emit for this emissions unit was based on a maximum SMC daily usage of 7200 pounds per day, a company-supplied OC volatilization emission factor of 0.0055, and an operating rate of 20 hours per day.

- 1.b** Emission Limitation:
587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 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** Emission Limitation:
5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press Area #7 (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

- 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 03-9858)	See Sections A.I.2.b, A.I.2.c, and A.II.1 below.

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 impossible for the permittee to track SMC usage 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, #5, #6 and #12, Ohio EPA emissions units numbers P009, P010, P013, P014, and P020, 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 73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 combined.
- 2.c** The permittee shall not emit more than 41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

II. Operational Restrictions

- Raw SMC usage in emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 shall not exceed a combined total of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period).
- The permittee shall collect raw scrap SMC at the end of every shift, and weigh and place it in a closed container that will minimize the volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for all compression molding operations:
 - a. the total mass (pounds/day) of raw SMC used in all compression molding presses;
 - b. the total mass (pounds/day) of raw SMC that was preheated before use in the presses;
 - c. the total mass (pounds/day) of raw SMC not preheated (a - b).
 - d. the rolling, 365-day SMC usage rate for all compression molding presses;
 - e. the OC emission rate for all compression molding operations calculated using the following formula:

E = the summation of (M)(F) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

E = the daily OC emissions, in pounds

M = the mass of raw SMC used that day, in tons (not including scrap)

F = emission factor in pounds OC per ton of raw SMC used in each of the above emissions units as follows:

7.00 pounds of OC per ton with preheating

4.00 pounds of OC per ton without preheating; and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.
2. The permittee shall collect and record the following information for each day for all scrap generation operations:
 - a. the permittee's identification of each type of scrap SMC generated;
 - b. the monomer content of each type of scrap SMC generated;
 - c. the weight in pounds of each type of scrap SMC generated; and
 - d. the total mass (tons/day) of scrap SMC generated.

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

3. The permittee shall collect and record the following information for each month for all scrap generation operations:
 - a. the total mass (tons/month) of scrap SMC generated;
 - b. the calculated average styrene content for all scrap SMC generated;
 - c. the OC emission rate for scrap SMC generation operations calculated using the following formula:

$E = \text{the summation of } (M)(T)(F) \text{ for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;}$

where,

$E = \text{the monthly OC emissions, in tons}$

$M = \text{the monthly amount of scrap generated, in tons}$

$T = \text{the average styrene content, in percent by weight, expressed as ton(s) of styrene per ton(s) of SMC}$

$F = 0.40 \text{ (company-supplied styrene volatilization emission factor); and}$

- d. the rolling, 12-month OC emission rate from the scrap generation operations associated with all of the compression molding operations at the facility, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations and/or usage restrictions:
 - a. the 73.4 tons of OC per year emission limitation, as a rolling, 365-day summation, for all compression molding operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;
 - b. the 41.9 tons of OC per year emission limitation, as a rolling, 12-month summation, for all scrap generation operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032; and
 - c. the raw SMC usage restrictions of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032.

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 exceedance occurs.

2. The permittee shall submit annual reports which summarize the actual annual OC emissions for the compression molding operations and associated scrap generation operations, in tons, for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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 shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.b Emission Limitation:
41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

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	OAC rule 3745-31-05 (PTI 03-9078)	See Sections B.I.2.a and B.I.2.b below.
	OAC rule 3745-31-05 (PTI 03-9858)	See Section B.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall not emit more than 3.08 pounds of OC per hour from this emissions unit. The 3.08 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.b The permittee shall not emit more than 5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.
- 2.c The permittee shall not emit more than 587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined.

II. Operational Restrictions

1. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application (PTI #03-9078) for this emissions unit. In addition to this emissions unit, emissions units P011, P026, P027, P028, P029, P030, and P031 were included in the modeling for air toxics since they emit the same pollutant and were 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): 213,000
 Maximum Hourly Emission Rate: 13.5
 Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 345.8
 MAGLC (ug/m3): 5070.0

II. Operational Restrictions (continued)

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":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. 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);
- c. 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
- d. 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.

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

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations:
 - a. the 587.3 pounds of OC per day emission limitation from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined; and
 - b. the 5.0 tons of OC per month emission limitation from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.

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 exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
The permittee shall not emit more than 3.19 pounds of OC per hour from this emissions unit.

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit. The potential to emit for this emissions unit was based on a maximum SMC daily usage of 11600 pounds per day, a company-supplied OC volatilization emission factor of 0.0055, and an operating rate of 20 hours per day.

- 1.b Emission Limitation:
587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 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 Emission Limitation:
5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press Area #8 (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 #8	OAC rule 3745-31-05 (PTI 03-9858)	See Sections A.I.2.b, A.I.2.c, and A.II.1 below.

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 impossible for the permittee to track SMC usage 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, #5, #6 and #12, Ohio EPA emissions units numbers P009, P010, P013, P014, and P020, 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 73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 combined.
- 2.c The permittee shall not emit more than 41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

II. Operational Restrictions

1. Raw SMC usage in emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 shall not exceed a combined total of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period).
2. The permittee shall collect raw scrap SMC at the end of every shift, and weigh and place it in a closed container that will minimize the volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for all compression molding operations:
 - a. the total mass (pounds/day) of raw SMC used in all compression molding presses;
 - b. the total mass (pounds/day) of raw SMC that was preheated before use in the presses;
 - c. the total mass (pounds/day) of raw SMC not preheated (a - b).
 - d. the rolling, 365-day SMC usage rate for all compression molding presses;
 - e. the OC emission rate for all compression molding operations calculated using the following formula:

E = the summation of (M)(F) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

E = the daily OC emissions, in pounds

M = the mass of raw SMC used that day, in tons (not including scrap)

F = emission factor in pounds OC per ton of raw SMC used in each of the above emissions units as follows:

7.00 pounds of OC per ton with preheating

4.00 pounds of OC per ton without preheating; and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.
2. The permittee shall collect and record the following information for each day for all scrap generation operations:
 - a. the permittee's identification of each type of scrap SMC generated;
 - b. the monomer content of each type of scrap SMC generated;
 - c. the weight in pounds of each type of scrap SMC generated; and
 - d. the total mass (tons/day) of scrap SMC generated.

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

3. The permittee shall collect and record the following information for each month for all scrap generation operations:
 - a. the total mass (tons/month) of scrap SMC generated;
 - b. the calculated average styrene content for all scrap SMC generated;
 - c. the OC emission rate for scrap SMC generation operations calculated using the following formula:

$E = \text{the summation of } (M)(T)(F) \text{ for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;}$

where,

$E = \text{the monthly OC emissions, in tons}$

$M = \text{the monthly amount of scrap generated, in tons}$

$T = \text{the average styrene content, in percent by weight, expressed as ton(s) of styrene per ton(s) of SMC}$

$F = 0.40 \text{ (company-supplied styrene volatilization emission factor); and}$

- d. the rolling, 12-month OC emission rate from the scrap generation operations associated with all of the compression molding operations at the facility, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations and/or usage restrictions:
 - a. the 73.4 tons of OC per year emission limitation, as a rolling, 365-day summation, for all compression molding operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;
 - b. the 41.9 tons of OC per year emission limitation, as a rolling, 12-month summation, for all scrap generation operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032; and
 - c. the raw SMC usage restrictions of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032.

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 exceedance occurs.

2. The permittee shall submit annual reports which summarize the actual annual OC emissions for the compression molding operations and associated scrap generation operations, in tons, for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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 shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.b Emission Limitation:
41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

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 #8	OAC rule 3745-31-05 (PTI 03-9078)	See Sections B.I.2.a and B.I.2.b below.
	OAC rule 3745-31-05 (PTI 03-9858)	See Section B.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall not emit more than 3.08 pounds of OC per hour from this emissions unit. The 3.08 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.b The permittee shall not emit more than 5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.
- 2.c The permittee shall not emit more than 587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations:
 - a. the 587.3 pounds of OC per day emission limitation from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined; and
 - b. the 5.0 tons of OC per month emission limitation from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.

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 exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:

The permittee shall not emit more than 1.98 pounds of OC per hour from this emissions unit.

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit. The potential to emit for this emissions unit was based on a maximum SMC daily usage of 7200 pounds per day, a company-supplied OC volatilization emission factor of 0.0055, and an operating rate of 20 hours per day.

1.b Emission Limitation:

587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 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 Emission Limitation:

5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press Area #9 (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 #9	OAC rule 3745-31-05 (PTI 03-9858)	See Sections A.I.2.b, A.I.2.c, and A.II.1 below.

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 impossible for the permittee to track SMC usage 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, #5, #6 and #12, Ohio EPA emissions units numbers P009, P010, P013, P014, and P020, 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 73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 combined.
- 2.c The permittee shall not emit more than 41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

II. Operational Restrictions

1. Raw SMC usage in emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 shall not exceed a combined total of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period).
2. The permittee shall collect raw scrap SMC at the end of every shift, and weigh and place it in a closed container that will minimize the volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for all compression molding operations:
 - a. the total mass (pounds/day) of raw SMC used in all compression molding presses;
 - b. the total mass (pounds/day) of raw SMC that was preheated before use in the presses;
 - c. the total mass (pounds/day) of raw SMC not preheated (a - b).
 - d. the rolling, 365-day SMC usage rate for all compression molding presses;
 - e. the OC emission rate for all compression molding operations calculated using the following formula:

E = the summation of (M)(F) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

E = the daily OC emissions, in pounds

M = the mass of raw SMC used that day, in tons (not including scrap)

F = emission factor in pounds OC per ton of raw SMC used in each of the above emissions units as follows:

7.00 pounds of OC per ton with preheating

4.00 pounds of OC per ton without preheating; and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.
2. The permittee shall collect and record the following information for each day for all scrap generation operations:
 - a. the permittee's identification of each type of scrap SMC generated;
 - b. the monomer content of each type of scrap SMC generated;
 - c. the weight in pounds of each type of scrap SMC generated; and
 - d. the total mass (tons/day) of scrap SMC generated.

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

3. The permittee shall collect and record the following information for each month for all scrap generation operations:
 - a. the total mass (tons/month) of scrap SMC generated;
 - b. the calculated average styrene content for all scrap SMC generated;
 - c. the OC emission rate for scrap SMC generation operations calculated using the following formula:

$E = \text{the summation of } (M)(T)(F) \text{ for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;}$

where,

$E = \text{the monthly OC emissions, in tons}$

$M = \text{the monthly amount of scrap generated, in tons}$

$T = \text{the average styrene content, in percent by weight, expressed as ton(s) of styrene per ton(s) of SMC}$

$F = 0.40 \text{ (company-supplied styrene volatilization emission factor); and}$

- d. the rolling, 12-month OC emission rate from the scrap generation operations associated with all of the compression molding operations at the facility, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations and/or usage restrictions:
 - a. the 73.4 tons of OC per year emission limitation, as a rolling, 365-day summation, for all compression molding operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;
 - b. the 41.9 tons of OC per year emission limitation, as a rolling, 12-month summation, for all scrap generation operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032; and
 - c. the raw SMC usage restrictions of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032.

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 exceedance occurs.

2. The permittee shall submit annual reports which summarize the actual annual OC emissions for the compression molding operations and associated scrap generation operations, in tons, for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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 shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.b Emission Limitation:
41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

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 #9	OAC rule 3745-31-05 (PTI 03-9078)	See Sections B.I.2.a and B.I.2.b below.
	OAC rule 3745-31-05 (PTI 03-9858)	See Section B.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall not emit more than 3.3 pounds of OC per hour from this emissions unit. The 3.3 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.b The permittee shall not emit more than 5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.
- 2.c The permittee shall not emit more than 587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations:
 - a. the 587.3 pounds of OC per day emission limitation from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined; and
 - b. the 5.0 tons of OC per month emission limitation from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.

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 exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
The permittee shall not emit more than 1.98 pounds of OC per hour from this emissions unit.

Applicable Compliance Method:
The hourly OC emission limitation is based on the emissions unit's potential to emit. The potential to emit for this emissions unit was based on a maximum SMC daily usage of 7200 pounds per day, a company-supplied OC volatilization emission factor of 0.0055, and an operating rate of 20 hours per day.

1.b Emission Limitation:
587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 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 Emission Limitation:
5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press Area #10 (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 #10	OAC rule 3745-31-05 (PTI 03-9858)	See Sections A.I.2.b, A.I.2.c, and A.II.1 below.

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 impossible for the permittee to track SMC usage 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, #5, #6 and #12, Ohio EPA emissions units numbers P009, P010, P013, P014, and P020, 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 73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 combined.
- 2.c The permittee shall not emit more than 41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

II. Operational Restrictions

1. Raw SMC usage in emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 shall not exceed a combined total of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period).
2. The permittee shall collect raw scrap SMC at the end of every shift, and weigh and place it in a closed container that will minimize the volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for all compression molding operations:
 - a. the total mass (pounds/day) of raw SMC used in all compression molding presses;
 - b. the total mass (pounds/day) of raw SMC that was preheated before use in the presses;
 - c. the total mass (pounds/day) of raw SMC not preheated (a - b).
 - d. the rolling, 365-day SMC usage rate for all compression molding presses;
 - e. the OC emission rate for all compression molding operations calculated using the following formula:

E = the summation of (M)(F) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

E = the daily OC emissions, in pounds

M = the mass of raw SMC used that day, in tons (not including scrap)

F = emission factor in pounds OC per ton of raw SMC used in each of the above emissions units as follows:

7.00 pounds of OC per ton with preheating

4.00 pounds of OC per ton without preheating; and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.
2. The permittee shall collect and record the following information for each day for all scrap generation operations:
 - a. the permittee's identification of each type of scrap SMC generated;
 - b. the monomer content of each type of scrap SMC generated;
 - c. the weight in pounds of each type of scrap SMC generated; and
 - d. the total mass (tons/day) of scrap SMC generated.

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

3. The permittee shall collect and record the following information for each month for all scrap generation operations:
 - a. the total mass (tons/month) of scrap SMC generated;
 - b. the calculated average styrene content for all scrap SMC generated;
 - c. the OC emission rate for scrap SMC generation operations calculated using the following formula:

$E = \text{the summation of } (M)(T)(F) \text{ for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;}$

where,

$E = \text{the monthly OC emissions, in tons}$

$M = \text{the monthly amount of scrap generated, in tons}$

$T = \text{the average styrene content, in percent by weight, expressed as ton(s) of styrene per ton(s) of SMC}$

$F = 0.40 \text{ (company-supplied styrene volatilization emission factor); and}$

- d. the rolling, 12-month OC emission rate from the scrap generation operations associated with all of the compression molding operations at the facility, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations and/or usage restrictions:
 - a. the 73.4 tons of OC per year emission limitation, as a rolling, 365-day summation, for all compression molding operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;
 - b. the 41.9 tons of OC per year emission limitation, as a rolling, 12-month summation, for all scrap generation operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032; and
 - c. the raw SMC usage restrictions of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032.

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 exceedance occurs.

2. The permittee shall submit annual reports which summarize the actual annual OC emissions for the compression molding operations and associated scrap generation operations, in tons, for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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 shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.b Emission Limitation:
41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

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 #10	OAC rule 3745-31-05 (PTI 03-9078)	See Sections B.I.2.a and B.I.2.b below.
	OAC rule 3745-31-05 (PTI 03-9858)	See Section B.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall not emit more than 4.29 pounds of OC per hour from this emissions unit. The 4.29 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.b The permittee shall not emit more than 5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.
- 2.c The permittee shall not emit more than 587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations:
 - a. the 587.3 pounds of OC per day emission limitation from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined; and
 - b. the 5.0 tons of OC per month emission limitation from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.

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 exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
The permittee shall not emit more than 1.98 pounds of OC per hour from this emissions unit.

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit. The potential to emit for this emissions unit was based on a maximum SMC daily usage of 7200 pounds per day, a company-supplied OC volatilization emission factor of 0.0055, and an operating rate of 20 hours per day.

- 1.b** Emission Limitation:
587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 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** Emission Limitation:
5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press Area #11 (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 #11	OAC rule 3745-31-05 (PTI 03-9858)	See Sections A.I.2.b, A.I.2.c, and A.II.1 below.

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 impossible for the permittee to track SMC usage 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, #5, #6 and #12, Ohio EPA emissions units numbers P009, P010, P013, P014, and P020, 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 73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 combined.
- 2.c The permittee shall not emit more than 41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

II. Operational Restrictions

1. Raw SMC usage in emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 shall not exceed a combined total of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period).
2. The permittee shall collect raw scrap SMC at the end of every shift, and weigh and place it in a closed container that will minimize the volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for all compression molding operations:
 - a. the total mass (pounds/day) of raw SMC used in all compression molding presses;
 - b. the total mass (pounds/day) of raw SMC that was preheated before use in the presses;
 - c. the total mass (pounds/day) of raw SMC not preheated (a - b).
 - d. the rolling, 365-day SMC usage rate for all compression molding presses;
 - e. the OC emission rate for all compression molding operations calculated using the following formula:

E = the summation of (M)(F) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

E = the daily OC emissions, in pounds

M = the mass of raw SMC used that day, in tons (not including scrap)

F = emission factor in pounds OC per ton of raw SMC used in each of the above emissions units as follows:

7.00 pounds of OC per ton with preheating

4.00 pounds of OC per ton without preheating; and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.
2. The permittee shall collect and record the following information for each day for all scrap generation operations:
 - a. the permittee's identification of each type of scrap SMC generated;
 - b. the monomer content of each type of scrap SMC generated;
 - c. the weight in pounds of each type of scrap SMC generated; and
 - d. the total mass (tons/day) of scrap SMC generated.

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

3. The permittee shall collect and record the following information for each month for all scrap generation operations:
 - a. the total mass (tons/month) of scrap SMC generated;
 - b. the calculated average styrene content for all scrap SMC generated;
 - c. the OC emission rate for scrap SMC generation operations calculated using the following formula:

$E = \text{the summation of } (M)(T)(F) \text{ for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;}$

where,

$E = \text{the monthly OC emissions, in tons}$

$M = \text{the monthly amount of scrap generated, in tons}$

$T = \text{the average styrene content, in percent by weight, expressed as ton(s) of styrene per ton(s) of SMC}$

$F = 0.40 \text{ (company-supplied styrene volatilization emission factor); and}$

- d. the rolling, 12-month OC emission rate from the scrap generation operations associated with all of the compression molding operations at the facility, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations and/or usage restrictions:
 - a. the 73.4 tons of OC per year emission limitation, as a rolling, 365-day summation, for all compression molding operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;
 - b. the 41.9 tons of OC per year emission limitation, as a rolling, 12-month summation, for all scrap generation operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032; and
 - c. the raw SMC usage restrictions of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032.

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 exceedance occurs.

2. The permittee shall submit annual reports which summarize the actual annual OC emissions for the compression molding operations and associated scrap generation operations, in tons, for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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 shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.b Emission Limitation:
41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

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 #11	OAC rule 3745-31-05 (PTI 03-9078)	See Sections B.I.2.a and B.I.2.b below.
	OAC rule 3745-31-05 (PTI 03-9858)	See Section B.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall not emit more than 2.75 pounds of OC per hour from this emissions unit. The 2.75 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.b The permittee shall not emit more than 5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.
- 2.c The permittee shall not emit more than 587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations:
 - a. the 587.3 pounds of OC per day emission limitation from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined; and
 - b. the 5.0 tons of OC per month emission limitation from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.

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 exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
The permittee shall not emit more than 1.98 pounds of OC per hour from this emissions unit.

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit. The potential to emit for this emissions unit was based on a maximum SMC daily usage of 7200 pounds per day, a company-supplied OC volatilization emission factor of 0.0055, and an operating rate of 20 hours per day.

- 1.b** Emission Limitation:
587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 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** Emission Limitation:
5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press Area #12 (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 #12	OAC rule 3745-31-05 (PTI 03-9858)	See Sections A.I.2.b, A.I.2.c, and A.II.1 below.

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 impossible for the permittee to track SMC usage 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, #5, #6 and #12, Ohio EPA emissions units numbers P009, P010, P013, P014, and P020, 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 73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 combined.
- 2.c The permittee shall not emit more than 41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

II. Operational Restrictions

1. Raw SMC usage in emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 shall not exceed a combined total of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period).
2. The permittee shall collect raw scrap SMC at the end of every shift, and weigh and place it in a closed container that will minimize the volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for all compression molding operations:
 - a. the total mass (pounds/day) of raw SMC used in all compression molding presses;
 - b. the total mass (pounds/day) of raw SMC that was preheated before use in the presses;
 - c. the total mass (pounds/day) of raw SMC not preheated (a - b).
 - d. the rolling, 365-day SMC usage rate for all compression molding presses;
 - e. the OC emission rate for all compression molding operations calculated using the following formula:

E = the summation of (M)(F) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

E = the daily OC emissions, in pounds

M = the mass of raw SMC used that day, in tons (not including scrap)

F = emission factor in pounds OC per ton of raw SMC used in each of the above emissions units as follows:

7.00 pounds of OC per ton with preheating

4.00 pounds of OC per ton without preheating; and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.
2. The permittee shall collect and record the following information for each day for all scrap generation operations:
 - a. the permittee's identification of each type of scrap SMC generated;
 - b. the monomer content of each type of scrap SMC generated;
 - c. the weight in pounds of each type of scrap SMC generated; and
 - d. the total mass (tons/day) of scrap SMC generated.

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

3. The permittee shall collect and record the following information for each month for all scrap generation operations:
 - a. the total mass (tons/month) of scrap SMC generated;
 - b. the calculated average styrene content for all scrap SMC generated;
 - c. the OC emission rate for scrap SMC generation operations calculated using the following formula:

$E = \text{the summation of } (M)(T)(F) \text{ for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;}$

where,

$E = \text{the monthly OC emissions, in tons}$

$M = \text{the monthly amount of scrap generated, in tons}$

$T = \text{the average styrene content, in percent by weight, expressed as ton(s) of styrene per ton(s) of SMC}$

$F = 0.40 \text{ (company-supplied styrene volatilization emission factor); and}$

- d. the rolling, 12-month OC emission rate from the scrap generation operations associated with all of the compression molding operations at the facility, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations and/or usage restrictions:
 - a. the 73.4 tons of OC per year emission limitation, as a rolling, 365-day summation, for all compression molding operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;
 - b. the 41.9 tons of OC per year emission limitation, as a rolling, 12-month summation, for all scrap generation operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032; and
 - c. the raw SMC usage restrictions of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032.

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 exceedance occurs.

2. The permittee shall submit annual reports which summarize the actual annual OC emissions for the compression molding operations and associated scrap generation operations, in tons, for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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 shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.b Emission Limitation:
41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

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 #12	OAC rule 3745-31-05 (PTI 03-9078)	See Sections B.I.2.a and B.I.2.b below.
	OAC rule 3745-31-05 (PTI 03-9858)	See Section B.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall not emit more than 1.43 pounds of OC per hour from this emissions unit. The 1.43 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.b The permittee shall not emit more than 5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.
- 2.c The permittee shall not emit more than 587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations:
 - a. the 587.3 pounds of OC per day emission limitation from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined; and
 - b. the 5.0 tons of OC per month emission limitation from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.

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 exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
The permittee shall not emit more than 1.98 pounds of OC per hour from this emissions unit.

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit. The potential to emit for this emissions unit was based on a maximum SMC daily usage of 7200 pounds per day, a company-supplied OC volatilization emission factor of 0.0055, and an operating rate of 20 hours per day.

- 1.b** Emission Limitation:
587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 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** Emission Limitation:
5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press Area #13 (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 #13	OAC rule 3745-31-05 (PTI 03-9858)	See Sections A.I.2.b, A.I.2.c, and A.II.1 below.

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 impossible for the permittee to track SMC usage 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, #5, #6 and #12, Ohio EPA emissions units numbers P009, P010, P013, P014, and P020, 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 73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 combined.
- 2.c The permittee shall not emit more than 41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

II. Operational Restrictions

1. Raw SMC usage in emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 shall not exceed a combined total of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period).
2. The permittee shall collect raw scrap SMC at the end of every shift, and weigh and place it in a closed container that will minimize the volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for all compression molding operations:
 - a. the total mass (pounds/day) of raw SMC used in all compression molding presses;
 - b. the total mass (pounds/day) of raw SMC that was preheated before use in the presses;
 - c. the total mass (pounds/day) of raw SMC not preheated (a - b).
 - d. the rolling, 365-day SMC usage rate for all compression molding presses;
 - e. the OC emission rate for all compression molding operations calculated using the following formula:

E = the summation of (M)(F) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

E = the daily OC emissions, in pounds

M = the mass of raw SMC used that day, in tons (not including scrap)

F = emission factor in pounds OC per ton of raw SMC used in each of the above emissions units as follows:

7.00 pounds of OC per ton with preheating

4.00 pounds of OC per ton without preheating; and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.
2. The permittee shall collect and record the following information for each day for all scrap generation operations:
 - a. the permittee's identification of each type of scrap SMC generated;
 - b. the monomer content of each type of scrap SMC generated;
 - c. the weight in pounds of each type of scrap SMC generated; and
 - d. the total mass (tons/day) of scrap SMC generated.

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

3. The permittee shall collect and record the following information for each month for all scrap generation operations:
 - a. the total mass (tons/month) of scrap SMC generated;
 - b. the calculated average styrene content for all scrap SMC generated;
 - c. the OC emission rate for scrap SMC generation operations calculated using the following formula:

$E =$ the summation of $(M)(T)(F)$ for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

$E =$ the monthly OC emissions, in tons

$M =$ the monthly amount of scrap generated, in tons

$T =$ the average styrene content, in percent by weight, expressed as ton(s) of styrene per ton(s) of SMC

$F = 0.40$ (company-supplied styrene volatilization emission factor); and

- d. the rolling, 12-month OC emission rate from the scrap generation operations associated with all of the compression molding operations at the facility, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations and/or usage restrictions:
 - a. the 73.4 tons of OC per year emission limitation, as a rolling, 365-day summation, for all compression molding operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;
 - b. the 41.9 tons of OC per year emission limitation, as a rolling, 12-month summation, for all scrap generation operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032; and
 - c. the raw SMC usage restrictions of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032.

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 exceedance occurs.

2. The permittee shall submit annual reports which summarize the actual annual OC emissions for the compression molding operations and associated scrap generation operations, in tons, for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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 shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.b Emission Limitation:
41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

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 #13	OAC rule 3745-31-05 (PTI 03-9078)	See Sections B.I.2.a and B.I.2.b below.
	OAC rule 3745-31-05 (PTI 03-9858)	See Section B.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall not emit more than 1.1 pounds of OC per hour from this emissions unit. The 1.1 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.b The permittee shall not emit more than 5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.
- 2.c The permittee shall not emit more than 587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations:
 - a. the 587.3 pounds of OC per day emission limitation from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined; and
 - b. the 5.0 tons of OC per month emission limitation from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.

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 exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
The permittee shall not emit more than 1.98 pounds of OC per hour from this emissions unit.

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit. The potential to emit for this emissions unit was based on a maximum SMC daily usage of 7200 pounds per day, a company-supplied OC volatilization emission factor of 0.0055, and an operating rate of 20 hours per day.

- 1.b** Emission Limitation:
587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 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** Emission Limitation:
5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press Area #14 (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 #14	OAC rule 3745-31-05 (PTI 03-9858)	See Sections A.I.2.b, A.I.2.c, and A.II.1 below.

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 impossible for the permittee to track SMC usage 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, #5, #6 and #12, Ohio EPA emissions units numbers P009, P010, P013, P014, and P020, 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 73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 combined.
- 2.c The permittee shall not emit more than 41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

II. Operational Restrictions

1. Raw SMC usage in emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 shall not exceed a combined total of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period).
2. The permittee shall collect raw scrap SMC at the end of every shift, and weigh and place it in a closed container that will minimize the volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for all compression molding operations:
 - a. the total mass (pounds/day) of raw SMC used in all compression molding presses;
 - b. the total mass (pounds/day) of raw SMC that was preheated before use in the presses;
 - c. the total mass (pounds/day) of raw SMC not preheated (a - b).
 - d. the rolling, 365-day SMC usage rate for all compression molding presses;
 - e. the OC emission rate for all compression molding operations calculated using the following formula:

E = the summation of (M)(F) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

E = the daily OC emissions, in pounds

M = the mass of raw SMC used that day, in tons (not including scrap)

F = emission factor in pounds OC per ton of raw SMC used in each of the above emissions units as follows:

7.00 pounds of OC per ton with preheating

4.00 pounds of OC per ton without preheating; and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.
2. The permittee shall collect and record the following information for each day for all scrap generation operations:
 - a. the permittee's identification of each type of scrap SMC generated;
 - b. the monomer content of each type of scrap SMC generated;
 - c. the weight in pounds of each type of scrap SMC generated; and
 - d. the total mass (tons/day) of scrap SMC generated.

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

3. The permittee shall collect and record the following information for each month for all scrap generation operations:
 - a. the total mass (tons/month) of scrap SMC generated;
 - b. the calculated average styrene content for all scrap SMC generated;
 - c. the OC emission rate for scrap SMC generation operations calculated using the following formula:

$E = \text{the summation of } (M)(T)(F) \text{ for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;}$

where,

$E = \text{the monthly OC emissions, in tons}$

$M = \text{the monthly amount of scrap generated, in tons}$

$T = \text{the average styrene content, in percent by weight, expressed as ton(s) of styrene per ton(s) of SMC}$

$F = 0.40 \text{ (company-supplied styrene volatilization emission factor); and}$

- d. the rolling, 12-month OC emission rate from the scrap generation operations associated with all of the compression molding operations at the facility, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations and/or usage restrictions:
 - a. the 73.4 tons of OC per year emission limitation, as a rolling, 365-day summation, for all compression molding operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;
 - b. the 41.9 tons of OC per year emission limitation, as a rolling, 12-month summation, for all scrap generation operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032; and
 - c. the raw SMC usage restrictions of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032.

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 exceedance occurs.

2. The permittee shall submit annual reports which summarize the actual annual OC emissions for the compression molding operations and associated scrap generation operations, in tons, for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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 shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.b Emission Limitation:
41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

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 #14	OAC rule 3745-31-05 (PTI 03-9078)	See Sections B.I.2.a and B.I.2.b below.
	OAC rule 3745-31-05 (PTI 03-9858)	See Section B.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall not emit more than 0.39 pound of OC per hour from this emissions unit. The 0.39 pound 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.b The permittee shall not emit more than 5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.
- 2.c The permittee shall not emit more than 587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations:
 - a. the 587.3 pounds of OC per day emission limitation from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined; and
 - b. the 5.0 tons of OC per month emission limitation from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.

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 exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
The permittee shall not emit more than 1.98 pounds of OC per hour from this emissions unit.

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit. The potential to emit for this emissions unit was based on a maximum SMC daily usage of 7200 pounds per day, a company-supplied OC volatilization emission factor of 0.0055, and an operating rate of 20 hours per day.

- 1.b** Emission Limitation:
587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 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** Emission Limitation:
5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press Area #15 (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 #15	OAC rule 3745-31-05 (PTI 03-9858)	See Sections A.I.2.b, A.I.2.c, and A.II.1 below.

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 impossible for the permittee to track SMC usage 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, #5, #6 and #12, Ohio EPA emissions units numbers P009, P010, P013, P014, and P020, 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 73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 combined.
- 2.c The permittee shall not emit more than 41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

II. Operational Restrictions

1. Raw SMC usage in emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 shall not exceed a combined total of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period).
2. The permittee shall collect raw scrap SMC at the end of every shift, and weigh and place it in a closed container that will minimize the volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for all compression molding operations:
 - a. the total mass (pounds/day) of raw SMC used in all compression molding presses;
 - b. the total mass (pounds/day) of raw SMC that was preheated before use in the presses;
 - c. the total mass (pounds/day) of raw SMC not preheated (a - b).
 - d. the rolling, 365-day SMC usage rate for all compression molding presses;
 - e. the OC emission rate for all compression molding operations calculated using the following formula:

E = the summation of (M)(F) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

E = the daily OC emissions, in pounds

M = the mass of raw SMC used that day, in tons (not including scrap)

F = emission factor in pounds OC per ton of raw SMC used in each of the above emissions units as follows:

7.00 pounds of OC per ton with preheating

4.00 pounds of OC per ton without preheating; and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.
2. The permittee shall collect and record the following information for each day for all scrap generation operations:
 - a. the permittee's identification of each type of scrap SMC generated;
 - b. the monomer content of each type of scrap SMC generated;
 - c. the weight in pounds of each type of scrap SMC generated; and
 - d. the total mass (tons/day) of scrap SMC generated.

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

3. The permittee shall collect and record the following information for each month for all scrap generation operations:
 - a. the total mass (tons/month) of scrap SMC generated;
 - b. the calculated average styrene content for all scrap SMC generated;
 - c. the OC emission rate for scrap SMC generation operations calculated using the following formula:

$E = \text{the summation of } (M)(T)(F) \text{ for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;}$

where,

$E = \text{the monthly OC emissions, in tons}$

$M = \text{the monthly amount of scrap generated, in tons}$

$T = \text{the average styrene content, in percent by weight, expressed as ton(s) of styrene per ton(s) of SMC}$

$F = 0.40 \text{ (company-supplied styrene volatilization emission factor); and}$

- d. the rolling, 12-month OC emission rate from the scrap generation operations associated with all of the compression molding operations at the facility, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations and/or usage restrictions:
 - a. the 73.4 tons of OC per year emission limitation, as a rolling, 365-day summation, for all compression molding operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;
 - b. the 41.9 tons of OC per year emission limitation, as a rolling, 12-month summation, for all scrap generation operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032; and
 - c. the raw SMC usage restrictions of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032.

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 exceedance occurs.

2. The permittee shall submit annual reports which summarize the actual annual OC emissions for the compression molding operations and associated scrap generation operations, in tons, for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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 shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.b Emission Limitation:
41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

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	OAC rule 3745-31-05 (PTI 03-9078)	See Sections B.I.2.a and B.I.2.b below.
	OAC rule 3745-31-05 (PTI 03-9858)	See Section B.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall not emit more than 0.83 pound of OC per hour from this emissions unit. The 0.83 pound 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.b The permittee shall not emit more than 5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.
- 2.c The permittee shall not emit more than 587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations:
 - a. the 587.3 pounds of OC per day emission limitation from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined; and
 - b. the 5.0 tons of OC per month emission limitation from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.

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 exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
The permittee shall not emit more than 1.98 pounds of OC per hour from this emissions unit.

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit. The potential to emit for this emissions unit was based on a maximum SMC daily usage of 7200 pounds per day, a company-supplied OC volatilization emission factor of 0.0055, and an operating rate of 20 hours per day.

- 1.b** Emission Limitation:
587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 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** Emission Limitation:
5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press Area #25 (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

- 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 #25	OAC rule 3745-31-05 (PTI 03-9858)	See Sections A.I.2.b, A.I.2.c, and A.II.1 below.

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 impossible for the permittee to track SMC usage 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, #5, #6 and #12, Ohio EPA emissions units numbers P009, P010, P013, P014, and P020, 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 73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 combined.
- 2.c** The permittee shall not emit more than 41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

II. Operational Restrictions

- Raw SMC usage in emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 shall not exceed a combined total of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period).
- The permittee shall collect raw scrap SMC at the end of every shift, and weigh and place it in a closed container that will minimize the volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for all compression molding operations:
 - a. the total mass (pounds/day) of raw SMC used in all compression molding presses;
 - b. the total mass (pounds/day) of raw SMC that was preheated before use in the presses;
 - c. the total mass (pounds/day) of raw SMC not preheated (a - b).
 - d. the rolling, 365-day SMC usage rate for all compression molding presses;
 - e. the OC emission rate for all compression molding operations calculated using the following formula:

E = the summation of (M)(F) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

E = the daily OC emissions, in pounds

M = the mass of raw SMC used that day, in tons (not including scrap)

F = emission factor in pounds OC per ton of raw SMC used in each of the above emissions units as follows:

7.00 pounds of OC per ton with preheating

4.00 pounds of OC per ton without preheating; and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.
2. The permittee shall collect and record the following information for each day for all scrap generation operations:
 - a. the permittee's identification of each type of scrap SMC generated;
 - b. the monomer content of each type of scrap SMC generated;
 - c. the weight in pounds of each type of scrap SMC generated; and
 - d. the total mass (tons/day) of scrap SMC generated.

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

3. The permittee shall collect and record the following information for each month for all scrap generation operations:
 - a. the total mass (tons/month) of scrap SMC generated;
 - b. the calculated average styrene content for all scrap SMC generated;
 - c. the OC emission rate for scrap SMC generation operations calculated using the following formula:

$E = \text{the summation of } (M)(T)(F) \text{ for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;}$

where,

$E = \text{the monthly OC emissions, in tons}$

$M = \text{the monthly amount of scrap generated, in tons}$

$T = \text{the average styrene content, in percent by weight, expressed as ton(s) of styrene per ton(s) of SMC}$

$F = 0.40 \text{ (company-supplied styrene volatilization emission factor); and}$

- d. the rolling, 12-month OC emission rate from the scrap generation operations associated with all of the compression molding operations at the facility, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations and/or usage restrictions:
 - a. the 73.4 tons of OC per year emission limitation, as a rolling, 365-day summation, for all compression molding operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;
 - b. the 41.9 tons of OC per year emission limitation, as a rolling, 12-month summation, for all scrap generation operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032; and
 - c. the raw SMC usage restrictions of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032.

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 exceedance occurs.

2. The permittee shall submit annual reports which summarize the actual annual OC emissions for the compression molding operations and associated scrap generation operations, in tons, for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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 shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.b Emission Limitation:
41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

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 #25	OAC rule 3745-31-05 (PTI 03-9078)	See Sections B.I.2.a and B.I.2.b below.
	OAC rule 3745-31-05 (PTI 03-9858)	See Section B.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall not emit more than 1.21 pounds of OC per hour from this emissions unit. The 1.21 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.b The permittee shall not emit more than 5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.
- 2.c The permittee shall not emit more than 587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations:
 - a. the 587.3 pounds of OC per day emission limitation from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined; and
 - b. the 5.0 tons of OC per month emission limitation from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.

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 exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
The permittee shall not emit more than 1.98 pounds of OC per hour from this emissions unit.

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit. The potential to emit for this emissions unit was based on a maximum SMC daily usage of 7200 pounds per day, a company-supplied OC volatilization emission factor of 0.0055, and an operating rate of 20 hours per day.

- 1.b** Emission Limitation:
587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 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** Emission Limitation:
5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press Area #19 (P026)

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 #19	OAC rule 3745-31-05 (PTI 03-9858)	See Sections A.I.2.b, A.I.2.c, and A.II.1 below.

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 impossible for the permittee to track SMC usage 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, #5, #6 and #12, Ohio EPA emissions units numbers P009, P010, P013, P014, and P020, 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 73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 combined.
- 2.c** The permittee shall not emit more than 41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

II. Operational Restrictions

1. Raw SMC usage in emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 shall not exceed a combined total of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period).
2. The permittee shall collect raw scrap SMC at the end of every shift, and weigh and place it in a closed container that will minimize the volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for all compression molding operations:
 - a. the total mass (pounds/day) of raw SMC used in all compression molding presses;
 - b. the total mass (pounds/day) of raw SMC that was preheated before use in the presses;
 - c. the total mass (pounds/day) of raw SMC not preheated (a - b).
 - d. the rolling, 365-day SMC usage rate for all compression molding presses;
 - e. the OC emission rate for all compression molding operations calculated using the following formula:

E = the summation of (M)(F) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

E = the daily OC emissions, in pounds

M = the mass of raw SMC used that day, in tons (not including scrap)

F = emission factor in pounds OC per ton of raw SMC used in each of the above emissions units as follows:

7.00 pounds of OC per ton with preheating

4.00 pounds of OC per ton without preheating; and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.
2. The permittee shall collect and record the following information for each day for all scrap generation operations:
 - a. the permittee's identification of each type of scrap SMC generated;
 - b. the monomer content of each type of scrap SMC generated;
 - c. the weight in pounds of each type of scrap SMC generated; and
 - d. the total mass (tons/day) of scrap SMC generated.

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

3. The permittee shall collect and record the following information for each month for all scrap generation operations:
 - a. the total mass (tons/month) of scrap SMC generated;
 - b. the calculated average styrene content for all scrap SMC generated;
 - c. the OC emission rate for scrap SMC generation operations calculated using the following formula:

$E = \text{the summation of } (M)(T)(F) \text{ for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;}$

where,

$E = \text{the monthly OC emissions, in tons}$

$M = \text{the monthly amount of scrap generated, in tons}$

$T = \text{the average styrene content, in percent by weight, expressed as ton(s) of styrene per ton(s) of SMC}$

$F = 0.40 \text{ (company-supplied styrene volatilization emission factor); and}$

- d. the rolling, 12-month OC emission rate from the scrap generation operations associated with all of the compression molding operations at the facility, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations and/or usage restrictions:
 - a. the 73.4 tons of OC per year emission limitation, as a rolling, 365-day summation, for all compression molding operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;
 - b. the 41.9 tons of OC per year emission limitation, as a rolling, 12-month summation, for all scrap generation operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032; and
 - c. the raw SMC usage restrictions of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032.

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 exceedance occurs.

2. The permittee shall submit annual reports which summarize the actual annual OC emissions for the compression molding operations and associated scrap generation operations, in tons, for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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 shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.b Emission Limitation:
41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

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 #19	OAC rule 3745-31-05 (PTI 03-9078)	See Sections B.I.2.a and B.I.2.b below.
	OAC rule 3745-31-05 (PTI 03-9858)	See Section B.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall not emit more than 1.65 pounds of OC per hour from this emissions unit. The 1.65 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.b The permittee shall not emit more than 5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.
- 2.c The permittee shall not emit more than 587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined.

II. Operational Restrictions

1. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application (PTI #03-9078) for this emissions unit. In addition to this emissions unit, emissions units P011, P015, P027, P028, P029, P030, and P031 were included in the modeling for air toxics since they emit the same pollutant and were 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): 213,000
 Maximum Hourly Emission Rate: 13.5
 Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 345.8
 MAGLC (ug/m3): 5070.0

II. Operational Restrictions (continued)

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":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. 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);
- c. 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
- d. 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.

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

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations:
 - a. the 587.3 pounds of OC per day emission limitation from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined; and
 - b. the 5.0 tons of OC per month emission limitation from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.

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 exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
The permittee shall not emit more than 3.19 pounds of OC per hour from this emissions unit.

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit. The potential to emit for this emissions unit was based on a maximum SMC daily usage of 11600 pounds per day, a company-supplied OC volatilization emission factor of 0.0055, and an operating rate of 20 hours per day.

- 1.b Emission Limitation:
587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 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 Emission Limitation:
5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press Area #20 (P027)

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

- 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 #20	OAC rule 3745-31-05 (PTI 03-9858)	See Sections A.I.2.b, A.I.2.c, and A.II.1 below.

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 impossible for the permittee to track SMC usage 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, #5, #6 and #12, Ohio EPA emissions units numbers P009, P010, P013, P014, and P020, 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 73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 combined.
- 2.c** The permittee shall not emit more than 41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

II. Operational Restrictions

- Raw SMC usage in emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 shall not exceed a combined total of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period).
- The permittee shall collect raw scrap SMC at the end of every shift, and weigh and place it in a closed container that will minimize the volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for all compression molding operations:
 - a. the total mass (pounds/day) of raw SMC used in all compression molding presses;
 - b. the total mass (pounds/day) of raw SMC that was preheated before use in the presses;
 - c. the total mass (pounds/day) of raw SMC not preheated (a - b).
 - d. the rolling, 365-day SMC usage rate for all compression molding presses;
 - e. the OC emission rate for all compression molding operations calculated using the following formula:

E = the summation of (M)(F) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

E = the daily OC emissions, in pounds

M = the mass of raw SMC used that day, in tons (not including scrap)

F = emission factor in pounds OC per ton of raw SMC used in each of the above emissions units as follows:

7.00 pounds of OC per ton with preheating

4.00 pounds of OC per ton without preheating; and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.
2. The permittee shall collect and record the following information for each day for all scrap generation operations:
 - a. the permittee's identification of each type of scrap SMC generated;
 - b. the monomer content of each type of scrap SMC generated;
 - c. the weight in pounds of each type of scrap SMC generated; and
 - d. the total mass (tons/day) of scrap SMC generated.

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

3. The permittee shall collect and record the following information for each month for all scrap generation operations:
 - a. the total mass (tons/month) of scrap SMC generated;
 - b. the calculated average styrene content for all scrap SMC generated;
 - c. the OC emission rate for scrap SMC generation operations calculated using the following formula:

$E =$ the summation of $(M)(T)(F)$ for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

$E =$ the monthly OC emissions, in tons

$M =$ the monthly amount of scrap generated, in tons

$T =$ the average styrene content, in percent by weight, expressed as ton(s) of styrene per ton(s) of SMC

$F = 0.40$ (company-supplied styrene volatilization emission factor); and

- d. the rolling, 12-month OC emission rate from the scrap generation operations associated with all of the compression molding operations at the facility, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations and/or usage restrictions:
 - a. the 73.4 tons of OC per year emission limitation, as a rolling, 365-day summation, for all compression molding operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;
 - b. the 41.9 tons of OC per year emission limitation, as a rolling, 12-month summation, for all scrap generation operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032; and
 - c. the raw SMC usage restrictions of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032.

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 exceedance occurs.

2. The permittee shall submit annual reports which summarize the actual annual OC emissions for the compression molding operations and associated scrap generation operations, in tons, for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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 shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.b Emission Limitation:
41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

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 #20	OAC rule 3745-31-05 (PTI 03-9078)	See Sections B.I.2.a and B.I.2.b below.
	OAC rule 3745-31-05 (PTI 03-9858)	See Section B.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall not emit more than 1.65 pounds of OC per hour from this emissions unit. The 1.65 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.b The permittee shall not emit more than 5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.
- 2.c The permittee shall not emit more than 587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined.

II. Operational Restrictions

1. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application (PTI #03-9078) for this emissions unit. In addition to this emissions unit, emissions units P011, P015, P026, P028, P029, P030, and P031 were included in the modeling for air toxics since they emit the same pollutant and were 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): 213,000
 Maximum Hourly Emission Rate: 13.5
 Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 345.8
 MAGLC (ug/m3): 5070.0

II. Operational Restrictions (continued)

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":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. 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);
- c. 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
- d. 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.

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

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations:
 - a. the 587.3 pounds of OC per day emission limitation from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined; and
 - b. the 5.0 tons of OC per month emission limitation from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.

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 exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
The permittee shall not emit more than 3.19 pounds of OC per hour from this emissions unit.

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit. The potential to emit for this emissions unit was based on a maximum SMC daily usage of 11600 pounds per day, a company-supplied OC volatilization emission factor of 0.0055, and an operating rate of 20 hours per day.

- 1.b Emission Limitation:
587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 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 Emission Limitation:
5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press Area #21 (P028)

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 #21	OAC rule 3745-31-05 (PTI 03-9858)	See Sections A.I.2.b, A.I.2.c, and A.II.1 below.

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 impossible for the permittee to track SMC usage 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, #5, #6 and #12, Ohio EPA emissions units numbers P009, P010, P013, P014, and P020, 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 73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 combined.
- 2.c** The permittee shall not emit more than 41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

II. Operational Restrictions

1. Raw SMC usage in emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 shall not exceed a combined total of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period).
2. The permittee shall collect raw scrap SMC at the end of every shift, and weigh and place it in a closed container that will minimize the volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for all compression molding operations:
 - a. the total mass (pounds/day) of raw SMC used in all compression molding presses;
 - b. the total mass (pounds/day) of raw SMC that was preheated before use in the presses;
 - c. the total mass (pounds/day) of raw SMC not preheated (a - b).
 - d. the rolling, 365-day SMC usage rate for all compression molding presses;
 - e. the OC emission rate for all compression molding operations calculated using the following formula:

E = the summation of (M)(F) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

E = the daily OC emissions, in pounds

M = the mass of raw SMC used that day, in tons (not including scrap)

F = emission factor in pounds OC per ton of raw SMC used in each of the above emissions units as follows:

7.00 pounds of OC per ton with preheating

4.00 pounds of OC per ton without preheating; and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.
2. The permittee shall collect and record the following information for each day for all scrap generation operations:
 - a. the permittee's identification of each type of scrap SMC generated;
 - b. the monomer content of each type of scrap SMC generated;
 - c. the weight in pounds of each type of scrap SMC generated; and
 - d. the total mass (tons/day) of scrap SMC generated.

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

3. The permittee shall collect and record the following information for each month for all scrap generation operations:
 - a. the total mass (tons/month) of scrap SMC generated;
 - b. the calculated average styrene content for all scrap SMC generated;
 - c. the OC emission rate for scrap SMC generation operations calculated using the following formula:

$E = \text{the summation of } (M)(T)(F) \text{ for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;}$

where,

$E = \text{the monthly OC emissions, in tons}$

$M = \text{the monthly amount of scrap generated, in tons}$

$T = \text{the average styrene content, in percent by weight, expressed as ton(s) of styrene per ton(s) of SMC}$

$F = 0.40 \text{ (company-supplied styrene volatilization emission factor); and}$

- d. the rolling, 12-month OC emission rate from the scrap generation operations associated with all of the compression molding operations at the facility, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations and/or usage restrictions:
 - a. the 73.4 tons of OC per year emission limitation, as a rolling, 365-day summation, for all compression molding operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;
 - b. the 41.9 tons of OC per year emission limitation, as a rolling, 12-month summation, for all scrap generation operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032; and
 - c. the raw SMC usage restrictions of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032.

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 exceedance occurs.

2. The permittee shall submit annual reports which summarize the actual annual OC emissions for the compression molding operations and associated scrap generation operations, in tons, for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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 shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.b Emission Limitation:
41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

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 #21	OAC rule 3745-31-05 (PTI 03-9078)	See Sections B.I.2.a and B.I.2.b below.
	OAC rule 3745-31-05 (PTI 03-9858)	See Section B.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall not emit more than 1.65 pounds of OC per hour from this emissions unit. The 1.65 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.b The permittee shall not emit more than 5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.
- 2.c The permittee shall not emit more than 587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined.

II. Operational Restrictions

1. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application (PTI #03-9078) for this emissions unit. In addition to this emissions unit, emissions units P011, P015, P026, P027, P029, P030, and P031 were included in the modeling for air toxics since they emit the same pollutant and were 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): 213,000
 Maximum Hourly Emission Rate: 13.5
 Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 345.8
 MAGLC (ug/m3): 5070.0

II. Operational Restrictions (continued)

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":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. 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);
- c. 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
- d. 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.

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

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations:
 - a. the 587.3 pounds of OC per day emission limitation from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined; and
 - b. the 5.0 tons of OC per month emission limitation from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.

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 exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
The permittee shall not emit more than 3.19 pounds of OC per hour from this emissions unit.

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit. The potential to emit for this emissions unit was based on a maximum SMC daily usage of 11600 pounds per day, a company-supplied OC volatilization emission factor of 0.0055, and an operating rate of 20 hours per day.

- 1.b Emission Limitation:
587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 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 Emission Limitation:
5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press Area #22 (P029)

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 #22	OAC rule 3745-31-05 (PTI 03-9858)	See Sections A.I.2.b, A.I.2.c, and A.II.1 below.

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 impossible for the permittee to track SMC usage 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, #5, #6 and #12, Ohio EPA emissions units numbers P009, P010, P013, P014, and P020, 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 73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 combined.
- 2.c The permittee shall not emit more than 41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

II. Operational Restrictions

1. Raw SMC usage in emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 shall not exceed a combined total of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period).
2. The permittee shall collect raw scrap SMC at the end of every shift, and weigh and place it in a closed container that will minimize the volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for all compression molding operations:
 - a. the total mass (pounds/day) of raw SMC used in all compression molding presses;
 - b. the total mass (pounds/day) of raw SMC that was preheated before use in the presses;
 - c. the total mass (pounds/day) of raw SMC not preheated (a - b).
 - d. the rolling, 365-day SMC usage rate for all compression molding presses;
 - e. the OC emission rate for all compression molding operations calculated using the following formula:

E = the summation of (M)(F) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

E = the daily OC emissions, in pounds

M = the mass of raw SMC used that day, in tons (not including scrap)

F = emission factor in pounds OC per ton of raw SMC used in each of the above emissions units as follows:

7.00 pounds of OC per ton with preheating

4.00 pounds of OC per ton without preheating; and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.
2. The permittee shall collect and record the following information for each day for all scrap generation operations:
 - a. the permittee's identification of each type of scrap SMC generated;
 - b. the monomer content of each type of scrap SMC generated;
 - c. the weight in pounds of each type of scrap SMC generated; and
 - d. the total mass (tons/day) of scrap SMC generated.

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

3. The permittee shall collect and record the following information for each month for all scrap generation operations:
 - a. the total mass (tons/month) of scrap SMC generated;
 - b. the calculated average styrene content for all scrap SMC generated;
 - c. the OC emission rate for scrap SMC generation operations calculated using the following formula:

$E = \text{the summation of } (M)(T)(F) \text{ for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;}$

where,

$E = \text{the monthly OC emissions, in tons}$

$M = \text{the monthly amount of scrap generated, in tons}$

$T = \text{the average styrene content, in percent by weight, expressed as ton(s) of styrene per ton(s) of SMC}$

$F = 0.40 \text{ (company-supplied styrene volatilization emission factor); and}$

- d. the rolling, 12-month OC emission rate from the scrap generation operations associated with all of the compression molding operations at the facility, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations and/or usage restrictions:
 - a. the 73.4 tons of OC per year emission limitation, as a rolling, 365-day summation, for all compression molding operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;
 - b. the 41.9 tons of OC per year emission limitation, as a rolling, 12-month summation, for all scrap generation operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032; and
 - c. the raw SMC usage restrictions of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032.

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 exceedance occurs.

2. The permittee shall submit annual reports which summarize the actual annual OC emissions for the compression molding operations and associated scrap generation operations, in tons, for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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 shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.b Emission Limitation:
41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

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 #22	OAC rule 3745-31-05 (PTI 03-9078)	See Sections B.I.2.a and B.I.2.b below.
	OAC rule 3745-31-05 (PTI 03-9858)	See Section B.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall not emit more than 1.65 pounds of OC per hour from this emissions unit. The 1.65 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.b The permittee shall not emit more than 5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.
- 2.c The permittee shall not emit more than 587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined.

II. Operational Restrictions

1. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application (PTI #03-9078) for this emissions unit. In addition to this emissions unit, emissions units P011, P015, P026, P027, P028, P030, and P031 were included in the modeling for air toxics since they emit the same pollutant and were 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): 213,000
 Maximum Hourly Emission Rate: 13.5
 Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 345.8
 MAGLC (ug/m3): 5070.0

II. Operational Restrictions (continued)

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":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. 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);
- c. 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
- d. 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.

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

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations:
 - a. the 587.3 pounds of OC per day emission limitation from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined; and
 - b. the 5.0 tons of OC per month emission limitation from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.

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 exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
The permittee shall not emit more than 3.19 pounds of OC per hour from this emissions unit.

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit. The potential to emit for this emissions unit was based on a maximum SMC daily usage of 11600 pounds per day, a company-supplied OC volatilization emission factor of 0.0055, and an operating rate of 20 hours per day.

- 1.b Emission Limitation:
587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 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 Emission Limitation:
5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press Area #23 (P030)

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 #23	OAC rule 3745-31-05 (PTI 03-9858)	See Sections A.I.2.b, A.I.2.c, and A.II.1 below.

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 impossible for the permittee to track SMC usage 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, #5, #6 and #12, Ohio EPA emissions units numbers P009, P010, P013, P014, and P020, 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 73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 combined.
- 2.c The permittee shall not emit more than 41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

II. Operational Restrictions

1. Raw SMC usage in emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 shall not exceed a combined total of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period).
2. The permittee shall collect raw scrap SMC at the end of every shift, and weigh and place it in a closed container that will minimize the volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for all compression molding operations:
 - a. the total mass (pounds/day) of raw SMC used in all compression molding presses;
 - b. the total mass (pounds/day) of raw SMC that was preheated before use in the presses;
 - c. the total mass (pounds/day) of raw SMC not preheated (a - b).
 - d. the rolling, 365-day SMC usage rate for all compression molding presses;
 - e. the OC emission rate for all compression molding operations calculated using the following formula:

E = the summation of (M)(F) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

E = the daily OC emissions, in pounds

M = the mass of raw SMC used that day, in tons (not including scrap)

F = emission factor in pounds OC per ton of raw SMC used in each of the above emissions units as follows:

7.00 pounds of OC per ton with preheating

4.00 pounds of OC per ton without preheating; and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.
2. The permittee shall collect and record the following information for each day for all scrap generation operations:
 - a. the permittee's identification of each type of scrap SMC generated;
 - b. the monomer content of each type of scrap SMC generated;
 - c. the weight in pounds of each type of scrap SMC generated; and
 - d. the total mass (tons/day) of scrap SMC generated.

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

3. The permittee shall collect and record the following information for each month for all scrap generation operations:
 - a. the total mass (tons/month) of scrap SMC generated;
 - b. the calculated average styrene content for all scrap SMC generated;
 - c. the OC emission rate for scrap SMC generation operations calculated using the following formula:

$E = \text{the summation of } (M)(T)(F) \text{ for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;}$

where,

$E = \text{the monthly OC emissions, in tons}$

$M = \text{the monthly amount of scrap generated, in tons}$

$T = \text{the average styrene content, in percent by weight, expressed as ton(s) of styrene per ton(s) of SMC}$

$F = 0.40 \text{ (company-supplied styrene volatilization emission factor); and}$

- d. the rolling, 12-month OC emission rate from the scrap generation operations associated with all of the compression molding operations at the facility, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations and/or usage restrictions:
 - a. the 73.4 tons of OC per year emission limitation, as a rolling, 365-day summation, for all compression molding operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;
 - b. the 41.9 tons of OC per year emission limitation, as a rolling, 12-month summation, for all scrap generation operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032; and
 - c. the raw SMC usage restrictions of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032.

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 exceedance occurs.

2. The permittee shall submit annual reports which summarize the actual annual OC emissions for the compression molding operations and associated scrap generation operations, in tons, for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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 shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.b Emission Limitation:
41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

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 #23	OAC rule 3745-31-05 (PTI 03-9078)	See Sections B.I.2.a and B.I.2.b below.
	OAC rule 3745-31-05 (PTI 03-9858)	See Section B.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall not emit more than 1.65 pounds of OC per hour from this emissions unit. The 1.65 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.b The permittee shall not emit more than 5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.
- 2.c The permittee shall not emit more than 587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined.

II. Operational Restrictions

1. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application (PTI #03-9078) for this emissions unit. In addition to this emissions unit, emissions units P011, P015, P026, P027, P028, P029, and P031 were included in the modeling for air toxics since they emit the same pollutant and were 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): 213,000
 Maximum Hourly Emission Rate: 13.5
 Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 345.8
 MAGLC (ug/m3): 5070.0

II. Operational Restrictions (continued)

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":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. 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);
- c. 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
- d. 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.

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

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations:
 - a. the 587.3 pounds of OC per day emission limitation from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined; and
 - b. the 5.0 tons of OC per month emission limitation from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.

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 exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
The permittee shall not emit more than 3.19 pounds of OC per hour from this emissions unit.

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit. The potential to emit for this emissions unit was based on a maximum SMC daily usage of 11600 pounds per day, a company-supplied OC volatilization emission factor of 0.0055, and an operating rate of 20 hours per day.

- 1.b Emission Limitation:
587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 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 Emission Limitation:
5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press Area #4 (P031)

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

- 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 03-9858)	See Sections A.I.2.b, A.I.2.c, and A.II.1 below.

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 impossible for the permittee to track SMC usage 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, #5, #6 and #12, Ohio EPA emissions units numbers P009, P010, P013, P014, and P020, 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 73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 combined.
- 2.c** The permittee shall not emit more than 41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

II. Operational Restrictions

- Raw SMC usage in emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 shall not exceed a combined total of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period).
- The permittee shall collect raw scrap SMC at the end of every shift, and weigh and place it in a closed container that will minimize the volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for all compression molding operations:
 - a. the total mass (pounds/day) of raw SMC used in all compression molding presses;
 - b. the total mass (pounds/day) of raw SMC that was preheated before use in the presses;
 - c. the total mass (pounds/day) of raw SMC not preheated (a - b).
 - d. the rolling, 365-day SMC usage rate for all compression molding presses;
 - e. the OC emission rate for all compression molding operations calculated using the following formula:

E = the summation of (M)(F) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

E = the daily OC emissions, in pounds

M = the mass of raw SMC used that day, in tons (not including scrap)

F = emission factor in pounds OC per ton of raw SMC used in each of the above emissions units as follows:

7.00 pounds of OC per ton with preheating

4.00 pounds of OC per ton without preheating; and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.
2. The permittee shall collect and record the following information for each day for all scrap generation operations:
 - a. the permittee's identification of each type of scrap SMC generated;
 - b. the monomer content of each type of scrap SMC generated;
 - c. the weight in pounds of each type of scrap SMC generated; and
 - d. the total mass (tons/day) of scrap SMC generated.

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

3. The permittee shall collect and record the following information for each month for all scrap generation operations:
 - a. the total mass (tons/month) of scrap SMC generated;
 - b. the calculated average styrene content for all scrap SMC generated;
 - c. the OC emission rate for scrap SMC generation operations calculated using the following formula:

$E = \text{the summation of } (M)(T)(F) \text{ for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;}$

where,

$E = \text{the monthly OC emissions, in tons}$

$M = \text{the monthly amount of scrap generated, in tons}$

$T = \text{the average styrene content, in percent by weight, expressed as ton(s) of styrene per ton(s) of SMC}$

$F = 0.40 \text{ (company-supplied styrene volatilization emission factor); and}$

- d. the rolling, 12-month OC emission rate from the scrap generation operations associated with all of the compression molding operations at the facility, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations and/or usage restrictions:
 - a. the 73.4 tons of OC per year emission limitation, as a rolling, 365-day summation, for all compression molding operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;
 - b. the 41.9 tons of OC per year emission limitation, as a rolling, 12-month summation, for all scrap generation operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032; and
 - c. the raw SMC usage restrictions of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032.

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 exceedance occurs.

2. The permittee shall submit annual reports which summarize the actual annual OC emissions for the compression molding operations and associated scrap generation operations, in tons, for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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 shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.b Emission Limitation:
41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

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	OAC rule 3745-31-05 (PTI 03-9078)	See Sections B.I.2.a and B.I.2.b below.
	OAC rule 3745-31-05 (PTI 03-9858)	See Section B.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall not emit more than 1.65 pounds of OC per hour from this emissions unit. The 1.65 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.b The permittee shall not emit more than 5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.
- 2.c The permittee shall not emit more than 587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined.

II. Operational Restrictions

1. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application (PTI #03-9078) for this emissions unit. In addition to this emissions unit, emissions units P011, P015, P026, P027, P028, P029, and P030 were included in the modeling for air toxics since they emit the same pollutant and were 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): 213,000
 Maximum Hourly Emission Rate: 13.5
 Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 345.8
 MAGLC (ug/m3): 5070.0

II. Operational Restrictions (continued)

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":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. 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);
- c. 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
- d. 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.

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

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations:
 - a. the 587.3 pounds of OC per day emission limitation from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined; and
 - b. the 5.0 tons of OC per month emission limitation from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 combined.

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 exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
The permittee shall not emit more than 3.19 pounds of OC per hour from this emissions unit.

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit. The potential to emit for this emissions unit was based on a maximum SMC daily usage of 11600 pounds per day, a company-supplied OC volatilization emission factor of 0.0055, and an operating rate of 20 hours per day.

- 1.b Emission Limitation:
587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 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 Emission Limitation:
5.0 tons of OC per month from scrap generation operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, and P031 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.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press Area #24 (P032)

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

- 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 #24	OAC rule 3745-31-05 (PTI 03-9858)	See Sections A.I.2.b, A.I.2.c, and A.II.1 below.

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 impossible for the permittee to track SMC usage 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, #5, #6 and #12, Ohio EPA emissions units numbers P009, P010, P013, P014, and P020, 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 73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 combined.
- 2.c** The permittee shall not emit more than 41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

II. Operational Restrictions

- Raw SMC usage in emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 shall not exceed a combined total of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period).
- The permittee shall collect raw scrap SMC at the end of every shift, and weigh and place it in a closed container that will minimize the volatilization of styrene.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for all compression molding operations:
 - a. the total mass (pounds/day) of raw SMC used in all compression molding presses;
 - b. the total mass (pounds/day) of raw SMC that was preheated before use in the presses;
 - c. the total mass (pounds/day) of raw SMC not preheated (a - b).
 - d. the rolling, 365-day SMC usage rate for all compression molding presses;
 - e. the OC emission rate for all compression molding operations calculated using the following formula:

E = the summation of (M)(F) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

E = the daily OC emissions, in pounds

M = the mass of raw SMC used that day, in tons (not including scrap)

F = emission factor in pounds OC per ton of raw SMC used in each of the above emissions units as follows:

7.00 pounds of OC per ton with preheating

4.00 pounds of OC per ton without preheating; and

- f. the rolling, 365-day OC emission rate for all compression molding operations, in tons.
2. The permittee shall collect and record the following information for each day for all scrap generation operations:
 - a. the permittee's identification of each type of scrap SMC generated;
 - b. the monomer content of each type of scrap SMC generated;
 - c. the weight in pounds of each type of scrap SMC generated; and
 - d. the total mass (tons/day) of scrap SMC generated.

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

3. The permittee shall collect and record the following information for each month for all scrap generation operations:
 - a. the total mass (tons/month) of scrap SMC generated;
 - b. the calculated average styrene content for all scrap SMC generated;
 - c. the OC emission rate for scrap SMC generation operations calculated using the following formula:

$E =$ the summation of $(M)(T)(F)$ for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;

where,

$E =$ the monthly OC emissions, in tons

$M =$ the monthly amount of scrap generated, in tons

$T =$ the average styrene content, in percent by weight, expressed as ton(s) of styrene per ton(s) of SMC

$F = 0.40$ (company-supplied styrene volatilization emission factor); and

- d. the rolling, 12-month OC emission rate from the scrap generation operations associated with all of the compression molding operations at the facility, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the following emission limitations and/or usage restrictions:
 - a. the 73.4 tons of OC per year emission limitation, as a rolling, 365-day summation, for all compression molding operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032;
 - b. the 41.9 tons of OC per year emission limitation, as a rolling, 12-month summation, for all scrap generation operations associated with emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032; and
 - c. the raw SMC usage restrictions of 167,800 pounds per day (83.9 tons/day) and 41.95 million pounds per rolling, 365-day period (20,975 tons/rolling, 365-day period) for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032.

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 exceedance occurs.

2. The permittee shall submit annual reports which summarize the actual annual OC emissions for the compression molding operations and associated scrap generation operations, in tons, for emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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 shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
73.4 tons of OC from compression molding operations, per rolling, 365-day period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.b Emission Limitation:
41.9 tons of OC from scrap generation operations, per rolling, 12-month period, from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031 and P032 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.

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 #24	OAC rule 3745-31-05 (PTI 03-9858)	See Sections B.I.2.a and B.I.2.b below.

2. Additional Terms and Conditions

- 2.a The permittee shall not emit more than 1.65 pounds of OC per hour from this emissions unit. The 1.65 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.b The permittee shall not emit more than 587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined.

II. Operational Restrictions

1. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application (PTI #03-9858) for this emissions unit. 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): 213,000
 Maximum Hourly Emission Rate: 1.65
 Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 43.22
 MAGLC (ug/m3): 5070.0

II. Operational Restrictions (continued)

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":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. 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);
- c. 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
- d. 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.

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

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily and/or monthly record showing an exceedance of the 587.3 pounds of OC per day emission limitation from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 combined. 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 exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
The permittee shall not emit more than 1.65 pounds of OC per hour from this emissions unit.

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit. The potential to emit for this emissions unit was based on a maximum SMC daily usage of 6000 pounds per day, a company-supplied OC volatilization emission factor of 0.0055, and an operating rate of 20 hours per day.

- 1.b** Emission Limitation:
587.3 pounds of OC per day from compression molding operations from emissions units P009, P010, P011, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, and P032 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.

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 FRP parts controlled with two baghouses	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 8.91 pounds per hour.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-08	None, see A.I.2.a below.
	OAC rule 3745-17-07(B)	None, see A.I.2.b below.

2. Additional Terms and Conditions

- This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

II. Operational Restrictions

- The pressure drop across each baghouse shall be maintained within the range of 0.5-7 inches of water when the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across each baghouse when 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(s). The permittee shall record the pressure drop across each baghouse on a weekly basis when the emissions unit is in operation.

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 limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

1.a Emission Limitation:
Particulate emissions shall not exceed 8.91 pounds per hour.

Applicable Compliance Method:

Compliance with this emission limitation can be determined by multiplying the baghouse manufacturer's guaranteed outlet grain loading (0.004 gr/dscf) by the maximum volumetric air flow rate for each of the baghouse control systems (4800 cu. ft./min. for the Energy Room control system and 8000 cu. ft./min. for the North control system), converting the units to pounds per hour, and summing the values for each control system.

If required, the permittee shall demonstrate compliance through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

1.b 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).

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 FRP parts controlled with two baghouses	OAC rule 3745-31-05 (PTI #03-3220)	<p>Particulate emissions from the stack serving this emissions unit shall not exceed 0.004 grain per dry standard cubic foot, 0.43 pound per hour, and 1.88 tons per year.</p> <p>Fugitive particulate emissions shall not exceed 2.15 tons per year. (See Section B.1.2.c below.)</p> <p>See Sections B.1.2.a and B.1.2.b below.</p>

2. Additional Terms and Conditions

- 2.a The permittee shall control particulate emissions from the secondary finishing operations by use of baghouses.
- 2.b All particulate emissions are assumed to be PM-10.
- 2.c The tons per year emission limitation for fugitive particulate emissions represents the potential to emit for fugitive particulate emissions; therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with this emission 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 limitations in Section B.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
Particulate emissions from the stack serving this emissions unit shall not exceed 0.004 grain per dry standard cubic foot.

Applicable Compliance Method:

This emission limitation is based upon the manufacturer's guaranteed outlet grain loading. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

- 1.b** Emission Limitation:
Particulate emissions from the stack serving this emissions unit shall not exceed 0.43 pound per hour.

Applicable Compliance Method:

This emission limitation was developed by using the baghouse manufacturer's guaranteed outlet grain loading and the maximum volumetric air flow rates for the baghouse control systems. Compliance shall be based upon the monitoring and record keeping specified in Section A.III.1. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

- 1.c** Emission Limitation:
Particulate emissions from the stack serving this emissions unit shall not exceed 1.88 tons per year.

Applicable Compliance Method:

The tons per year emission limitation was developed by multiplying the pound per hour emission limitation by the maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance will also be shown with the annual emission limitation.

- 1.d** Emission Limitation:
Fugitive particulate emissions shall not exceed 2.15 tons per year.

Applicable Compliance Method:

This emission limitation was developed using a company-supplied emission factor (0.000000204 pound of particulate emissions per cubic foot - derived from actual sampling of the air in the secondary finishing operations building), the maximum volumetric flow rate from the building ventilation system (24,000,000 cubic feet per hour), and the emissions unit's maximum operating schedule (8,760 hours per year).

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth #1 (R012)
Activity Description: Primer Spray Booth #1

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>
plastic automotive parts spray booth controlled with a water wash and baffles	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-21-07(G)	None, see Section A.II.1 below.
	OAC rule 3475-31-05 (PTI 03-13051)	Organic compound (OC) emissions shall not exceed 124.0 tons per year based upon a rolling, 12-month summation of the monthly OC input rates to emissions units R012, R013, R014, and R015. (See Section A.I.2.a below.)

2. Additional Terms and Conditions

- 2.a The monthly OC input rate for emissions units R012, R013, R014, and R015 equals the summation of (C)(D); where C is the number of gallons of each coating and cleanup material employed per month and D is the OC content of each coating and cleanup material employed, in pounds of OC per gallon of coating or cleanup material. The monthly OC input rates are equivalent to monthly OC emission rates and, in the absence of add-on controls, are based upon 100% of the solvent in the coating and/or cleanup materials being emitted.

II. Operational Restrictions

1. The permittee shall not employ any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.
2. The permittee shall operate the water wash and baffles when the emissions unit is in operation.

II. Operational Restrictions (continued)

3. To ensure federal enforceability, during the first 12 calendar months of operation following the issuance of PTI 03-3051, the permittee shall not exceed the following OC input rates (from coating and cleanup material usage) for emissions units R012, R013, R014, and R015 combined:

Month	Maximum Allowable Cumulative OC Input Rate (tons)
.	
1	21.6
1-2	43.2
1-3	64.8
1-4	86.4
1-5	108.0
1-6	124.0
1-7	124.0
1-8	124.0
1-9	124.0
1-10	124.0
1-11	124.0
1-12	124.0

After the first 12 calendar months of operation following the issuance of PTI 03-3051, compliance with the annual OC emission limitation of 124.0 tons shall be based upon a rolling, 12-month summation of the coating and cleanup material OC input rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:
- the company identification for each coating and cleanup material employed;
 - documentation on whether or not each coating or cleanup material is a photochemically reactive material;
 - the number of gallons of each coating and cleanup material employed;
 - the OC content of each coating and cleanup material, in pounds per gallon, as applied;
 - the OC input rate for each coating and cleanup material, as applied, in tons per month $[(c) \times (d)/2000]$; and
 - the total OC input rate (emission rate) for all coating and cleanup materials, as applied, in tons per month [summation of (e)].
2. During the first 12 calendar months of operation following the issuance of PTI 03-3051, the permittee shall collect and record the cumulative OC input rate for each calendar month for emissions units R012, R013, R014, and R015, in tons.

Beginning after the first 12 calendar months of operation following the issuance of PTI 03-3051, the permittee shall collect and record the rolling, 12-month summation of the OC input rates for emissions units R012, R013, R014, and R015 combined, in tons.

3. 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 baffle exhaust filtration systems 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 notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of noncomplying coatings and/or cleanup materials (i.e., any coating or cleanup material which is a photochemically reactive material) in this emissions unit. 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 exceedance occurs.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation and, for the first 12 calendar months following the issuance of PTI 03-13051, all exceedances of the maximum allowable cumulative monthly OC input rates.
4. The permittee shall report the actual annual OC emissions from emissions units R012, R013, R014, and R015 in the fee emission report required pursuant to OAC rule 3745-78-02(A).

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I 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:
Particulate emissions 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:

$$E = (M) * (1-TE) * (1-CE)$$

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. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment (90% for the water wash and baffles).

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).

- 1.c Emission Limitation:
OC emissions shall not exceed 124.0 tons per year based upon a rolling, 12-month summation of the monthly OC input rates to emissions units R012, R013, R014, and R015.

Applicable Compliance Method:

Compliance with this emission limitation 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.d** The permittee shall determine the composition of the coating and/or cleanup material by formulation data supplied by the manufacturer of the coating and/or cleanup material, or from data determined by analysis of each coating and/or cleanup material, as received, in accordance with 40 CFR Part 60, Appendix A, Method 24.

Any determination of the OC content, solids content, or density of a coating and/or cleanup material shall be based upon the coating and/or cleanup material, as applied, including the addition of any thinner or viscosity reducer to the coating and/or cleanup material.

If required, the permittee shall determine the OC content of the coatings and/or cleanup materials, as applied, in accordance with 40 CFR Part 60, Appendix A, Method 24 or an equivalent or alternative method.

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>
plastic automotive parts spray booth controlled with a water wash and baffles	OAC rule 3745-31-05 (PTI 03-3051)	<p>OC emissions shall not exceed 15.0 pounds per hour, from the application of coating materials.</p> <p>OC emissions shall not exceed 173.0 pounds per month, from the application of cleanup materials.</p> <p>OC emissions shall not exceed 66.7 tons per year when coating non-metal parts and photochemically reactive materials (coatings and cleanup materials) are not employed.</p> <p>Particulate emissions shall not exceed 0.10 pound per hour and 0.44 ton per year.</p> <p>Visible particulate emissions shall not exceed 0% opacity, as a six-minute average.</p> <p>See Section B.I.2.a below.</p>

2. Additional Terms and Conditions

- 2.a The OC emission limitations specified in Section B.I.1 above were 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 these emission limitations.

II. Operational Restrictions

1. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application (PTI 03-3051) for this emissions unit. In addition to this emissions unit, emissions units R013, R014, and R015 were included in the modeling for air toxics since they emit the same pollutant and were 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 are 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: MIBK
TLV (ug/m3): 205,000
Maximum Hourly Emission Rate (lbs/hr): 15.00
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 670.7
MAGLC (ug/m3): 4880.0

OAC Chapter 3745-31 requires a permittee 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":

- a. changes in the composition of materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. change to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission rate specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. change in the composition of materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. 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.

The 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

1. Compliance with the emissions limitations specified in Section B.I shall be determined in accordance with the following methods:
 - 1.a Emission Limitations:
Particulate emissions shall not exceed 0.10 pound per hour and 0.44 ton per year.

Applicable Compliance Method:

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

$$E = (M) * (1-TE) * (1-CE)$$

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. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment (90% for the water wash and baffles).

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

Compliance with the annual particulate emission limitation will be assumed as long as compliance with the hourly particulate emission limitation is maintained. The annual emission limitation was established by multiplying the hourly particulate emission limitation by 8760 hours and dividing by 2000 pounds.

- 1.b Emission Limitation:
Visible particulate emissions shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

- 1.c Emission Limitation:
OC emissions shall not exceed 15.0 pounds per hour, from the application of coating materials.

Applicable Compliance Method:

This emission limitation is based on the emissions unit's potential to emit. The potential to emit was based on the emissions unit's maximum hourly coating usage rate (3.37 gallons) multiplied by the maximum OC content of the coatings employed (4.45 pounds per gallon).

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
OC emissions shall not exceed 173.0 pounds per month, from the application of cleanup materials.

Applicable Compliance Method:

This emission limitation is based on the emissions unit's potential to emit. The potential to emit was based on the emissions unit's maximum monthly cleanup usage rate (25 gallons) multiplied by the maximum OC content of the cleanup materials employed (6.92 pounds per gallon).

- 1.e** Emission Limitation:
OC emissions shall not exceed 66.7 tons per year when coating non-metal parts and photochemically reactive materials (coatings and cleanup materials) are not employed.

Applicable Compliance Method:

This emission limitation is based on the emissions unit's potential to emit. The annual potential to emit was based on a maximum emissions rate of 65.7 tons per year from coating operations plus a maximum emissions rate of 1.0 ton per year from cleanup operations.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth #2 (R013)
Activity Description: Primer Spray Booth #2

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>
plastic automotive parts spray booth controlled with a water wash and baffles	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-21-07(G)	None, see Section A.II.1 below.
	OAC rule 3475-31-05 (PTI 03-13051)	Organic compound (OC) emissions shall not exceed 124.0 tons per year based upon a rolling, 12-month summation of the monthly OC input rates to emissions units R012, R013, R014, and R015. (See Section A.I.2.a below.)

2. Additional Terms and Conditions

- 2.a The monthly OC input rate for emissions units R012, R013, R014, and R015 equals the summation of (C)(D); where C is the number of gallons of each coating and cleanup material employed per month and D is the OC content of each coating and cleanup material employed, in pounds of OC per gallon of coating or cleanup material. The monthly OC input rates are equivalent to monthly OC emission rates and, in the absence of add-on controls, are based upon 100% of the solvent in the coating and/or cleanup materials being emitted.

II. Operational Restrictions

1. The permittee shall not employ any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.
2. The permittee shall operate the water wash and baffles when the emissions unit is in operation.

II. Operational Restrictions (continued)

3. To ensure federal enforceability, during the first 12 calendar months of operation following the issuance of PTI 03-3051, the permittee shall not exceed the following OC input rates (from coating and cleanup material usage) for emissions units R012, R013, R014, and R015 combined:

Month	Maximum Allowable Cumulative OC Input Rate (tons)
.	
1	21.6
1-2	43.2
1-3	64.8
1-4	86.4
1-5	108.0
1-6	124.0
1-7	124.0
1-8	124.0
1-9	124.0
1-10	124.0
1-11	124.0
1-12	124.0

After the first 12 calendar months of operation following the issuance of PTI 03-3051, compliance with the annual OC emission limitation of 124.0 tons shall be based upon a rolling, 12-month summation of the coating and cleanup material OC input rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating or cleanup material is a photochemically reactive material;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC content of each coating and cleanup material, in pounds per gallon, as applied;
 - e. the OC input rate for each coating and cleanup material, as applied, in tons per month $[(c) \times (d)/2000]$; and
 - f. the total OC input rate (emission rate) for all coating and cleanup materials, as applied, in tons per month [summation of (e)].
2. During the first 12 calendar months of operation following the issuance of PTI 03-3051, the permittee shall collect and record the cumulative OC input rate for each calendar month for emissions units R012, R013, R014, and R015, in tons.

Beginning after the first 12 calendar months of operation following the issuance of PTI 03-3051, the permittee shall collect and record the rolling, 12-month summation of the OC input rates for emissions units R012, R013, R014, and R015 combined, in tons.

3. 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 baffle exhaust filtration systems 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 notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of noncomplying coatings and/or cleanup materials (i.e., any coating or cleanup material which is a photochemically reactive material) in this emissions unit. 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 exceedance occurs.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation and, for the first 12 calendar months following the issuance of PTI 03-13051, all exceedances of the maximum allowable cumulative monthly OC input rates.
4. The permittee shall report the actual annual OC emissions from emissions units R012, R013, R014, and R015 in the fee emission report required pursuant to OAC rule 3745-78-02(A).

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I 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:

Particulate emissions 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:

$$E = (M) * (1-TE) * (1-CE)$$

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. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment (90% for the water wash and baffles).

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).

1.c Emission Limitation:

OC emissions shall not exceed 124.0 tons per year based upon a rolling, 12-month summation of the monthly OC input rates to emissions units R012, R013, R014, and R015.

Applicable Compliance Method:

Compliance with this emission limitation 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.d** The permittee shall determine the composition of the coating and/or cleanup material by formulation data supplied by the manufacturer of the coating and/or cleanup material, or from data determined by analysis of each coating and/or cleanup material, as received, in accordance with 40 CFR Part 60, Appendix A, Method 24.

Any determination of the OC content, solids content, or density of a coating and/or cleanup material shall be based upon the coating and/or cleanup material, as applied, including the addition of any thinner or viscosity reducer to the coating and/or cleanup material.

If required, the permittee shall determine the OC content of the coatings and/or cleanup materials, as applied, in accordance with 40 CFR Part 60, Appendix A, Method 24 or an equivalent or alternative method.

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>
plastic automotive parts spray booth controlled with a water wash and baffles	OAC rule 3745-31-05 (PTI 03-3051)	<p>OC emissions shall not exceed 15.0 pounds per hour, from the application of coating materials.</p> <p>OC emissions shall not exceed 173.0 pounds per month, from the application of cleanup materials.</p> <p>OC emissions shall not exceed 66.7 tons per year when coating non-metal parts and photochemically reactive materials (coatings and cleanup materials) are not employed.</p> <p>Particulate emissions shall not exceed 0.10 pound per hour and 0.44 ton per year.</p> <p>Visible particulate emissions shall not exceed 0% opacity, as a six-minute average.</p> <p>See Section B.I.2.a below.</p>

2. Additional Terms and Conditions

- 2.a The OC emission limitations specified in Section B.I.1 above were 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 these emission limitations.

II. Operational Restrictions

1. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application (PTI 03-3051) for this emissions unit. In addition to this emissions unit, emissions units R012, R014, and R015 were included in the modeling for air toxics since they emit the same pollutant and were 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 are 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: MIBK
TLV (ug/m3): 205,000
Maximum Hourly Emission Rate (lbs/hr): 15.00
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 670.7
MAGLC (ug/m3): 4880.0

OAC Chapter 3745-31 requires a permittee 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":

- a. changes in the composition of materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. change to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission rate specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. change in the composition of materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. 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.

The 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

1. Compliance with the emissions limitations specified in Section B.I shall be determined in accordance with the following methods:

- 1.a Emission Limitations:
Particulate emissions shall not exceed 0.10 pound per hour and 0.44 ton per year.

Applicable Compliance Method:

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

$$E = (M) * (1-TE) * (1-CE)$$

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. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment (90% for the water wash and baffles).

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

Compliance with the annual particulate emission limitation will be assumed as long as compliance with the hourly particulate emission limitation is maintained. The annual emission limitation was established by multiplying the hourly particulate emission limitation by 8760 hours and dividing by 2000 pounds.

- 1.b Emission Limitation:
Visible particulate emissions shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

- 1.c Emission Limitation:
OC emissions shall not exceed 15.0 pounds per hour, from the application of coating materials.

Applicable Compliance Method:

This emission limitation is based on the emissions unit's potential to emit. The potential to emit was based on the emissions unit's maximum hourly coating usage rate (3.37 gallons) multiplied by the maximum OC content of the coatings employed (4.45 pounds per gallon).

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
OC emissions shall not exceed 173.0 pounds per month, from the application of cleanup materials.

Applicable Compliance Method:

This emission limitation is based on the emissions unit's potential to emit. The potential to emit was based on the emissions unit's maximum monthly cleanup usage rate (25 gallons) multiplied by the maximum OC content of the cleanup materials employed (6.92 pounds per gallon).

- 1.e** Emission Limitation:
OC emissions shall not exceed 66.7 tons per year when coating non-metal parts and photochemically reactive materials (coatings and cleanup materials) are not employed.

Applicable Compliance Method:

This emission limitation is based on the emissions unit's potential to emit. The annual potential to emit was based on a maximum emissions rate of 65.7 tons per year from coating operations plus a maximum emissions rate of 1.0 ton per year from cleanup operations.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth #3 (R014)
Activity Description: Primer 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>
plastic automotive parts spray booth controlled with a water wash and baffles	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-21-07(G)	None, see Section A.II.1 below.
	OAC rule 3475-31-05 (PTI 03-13051)	Organic compound (OC) emissions shall not exceed 124.0 tons per year based upon a rolling, 12-month summation of the monthly OC input rates to emissions units R012, R013, R014, and R015. (See Section A.I.2.a below.)

2. Additional Terms and Conditions

- 2.a The monthly OC input rate for emissions units R012, R013, R014, and R015 equals the summation of (C)(D); where C is the number of gallons of each coating and cleanup material employed per month and D is the OC content of each coating and cleanup material employed, in pounds of OC per gallon of coating or cleanup material. The monthly OC input rates are equivalent to monthly OC emission rates and, in the absence of add-on controls, are based upon 100% of the solvent in the coating and/or cleanup materials being emitted.

II. Operational Restrictions

1. The permittee shall not employ any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.
2. The permittee shall operate the water wash and baffles when the emissions unit is in operation.

II. Operational Restrictions (continued)

3. To ensure federal enforceability, during the first 12 calendar months of operation following the issuance of PTI 03-3051, the permittee shall not exceed the following OC input rates (from coating and cleanup material usage) for emissions units R012, R013, R014, and R015 combined:

Month	Maximum Allowable Cumulative OC Input Rate (tons)
.	
1	21.6
1-2	43.2
1-3	64.8
1-4	86.4
1-5	108.0
1-6	124.0
1-7	124.0
1-8	124.0
1-9	124.0
1-10	124.0
1-11	124.0
1-12	124.0

After the first 12 calendar months of operation following the issuance of PTI 03-3051, compliance with the annual OC emission limitation of 124.0 tons shall be based upon a rolling, 12-month summation of the coating and cleanup material OC input rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:
- the company identification for each coating and cleanup material employed;
 - documentation on whether or not each coating or cleanup material is a photochemically reactive material;
 - the number of gallons of each coating and cleanup material employed;
 - the OC content of each coating and cleanup material, in pounds per gallon, as applied;
 - the OC input rate for each coating and cleanup material, as applied, in tons per month $[(c) \times (d)/2000]$; and
 - the total OC input rate (emission rate) for all coating and cleanup materials, as applied, in tons per month [summation of (e)].
2. During the first 12 calendar months of operation following the issuance of PTI 03-3051, the permittee shall collect and record the cumulative OC input rate for each calendar month for emissions units R012, R013, R014, and R015, in tons.

Beginning after the first 12 calendar months of operation following the issuance of PTI 03-3051, the permittee shall collect and record the rolling, 12-month summation of the OC input rates for emissions units R012, R013, R014, and R015 combined, in tons.

3. 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 baffle exhaust filtration systems 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 notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of noncomplying coatings and/or cleanup materials (i.e., any coating or cleanup material which is a photochemically reactive material) in this emissions unit. 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 exceedance occurs.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation and, for the first 12 calendar months following the issuance of PTI 03-13051, all exceedances of the maximum allowable cumulative monthly OC input rates.
4. The permittee shall report the actual annual OC emissions from emissions units R012, R013, R014, and R015 in the fee emission report required pursuant to OAC rule 3745-78-02(A).

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I 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:

Particulate emissions 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:

$$E = (M) * (1-TE) * (1-CE)$$

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. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment (90% for the water wash and baffles).

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).

- 1.c Emission Limitation:

OC emissions shall not exceed 124.0 tons per year based upon a rolling, 12-month summation of the monthly OC input rates to emissions units R012, R013, R014, and R015.

Applicable Compliance Method:

Compliance with this emission limitation 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.d** The permittee shall determine the composition of the coating and/or cleanup material by formulation data supplied by the manufacturer of the coating and/or cleanup material, or from data determined by analysis of each coating and/or cleanup material, as received, in accordance with 40 CFR Part 60, Appendix A, Method 24.

Any determination of the OC content, solids content, or density of a coating and/or cleanup material shall be based upon the coating and/or cleanup material, as applied, including the addition of any thinner or viscosity reducer to the coating and/or cleanup material.

If required, the permittee shall determine the OC content of the coatings and/or cleanup materials, as applied, in accordance with 40 CFR Part 60, Appendix A, Method 24 or an equivalent or alternative method.

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>
plastic automotive parts spray booth controlled with a water wash and baffles	OAC rule 3745-31-05 (PTI 03-3051)	<p>OC emissions shall not exceed 15.0 pounds per hour, from the application of coating materials.</p> <p>OC emissions shall not exceed 173.0 pounds per month, from the application of cleanup materials.</p> <p>OC emissions shall not exceed 66.7 tons per year when coating non-metal parts and photochemically reactive materials (coatings and cleanup materials) are not employed.</p> <p>Particulate emissions shall not exceed 0.10 pound per hour and 0.44 ton per year.</p> <p>Visible particulate emissions shall not exceed 0% opacity, as a six-minute average.</p> <p>See Section B.I.2.a below.</p>

2. Additional Terms and Conditions

- 2.a The OC emission limitations specified in Section B.I.1 above were 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 these emission limitations.

II. Operational Restrictions

1. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application (PTI 03-3051) for this emissions unit. In addition to this emissions unit, emissions units R012, R013, and R015 were included in the modeling for air toxics since they emit the same pollutant and were 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 are 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: MIBK
TLV (ug/m3): 205,000
Maximum Hourly Emission Rate (lbs/hr): 15.00
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 670.7
MAGLC (ug/m3): 4880.0

OAC Chapter 3745-31 requires a permittee 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":

- a. changes in the composition of materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. change to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission rate specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. change in the composition of materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. 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.

The 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

1. Compliance with the emissions limitations specified in Section B.I shall be determined in accordance with the following methods:
 - 1.a Emission Limitations:
Particulate emissions shall not exceed 0.10 pound per hour and 0.44 ton per year.

Applicable Compliance Method:

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

$$E = (M) * (1-TE) * (1-CE)$$

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. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment (90% for the water wash and baffles).

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

Compliance with the annual particulate emission limitation will be assumed as long as compliance with the hourly particulate emission limitation is maintained. The annual emission limitation was established by multiplying the hourly particulate emission limitation by 8760 hours and dividing by 2000 pounds.

- 1.b Emission Limitation:
Visible particulate emissions shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

- 1.c Emission Limitation:
OC emissions shall not exceed 15.0 pounds per hour, from the application of coating materials.

Applicable Compliance Method:

This emission limitation is based on the emissions unit's potential to emit. The potential to emit was based on the emissions unit's maximum hourly coating usage rate (3.37 gallons) multiplied by the maximum OC content of the coatings employed (4.45 pounds per gallon).

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
OC emissions shall not exceed 173.0 pounds per month, from the application of cleanup materials.

Applicable Compliance Method:

This emission limitation is based on the emissions unit's potential to emit. The potential to emit was based on the emissions unit's maximum monthly cleanup usage rate (25 gallons) multiplied by the maximum OC content of the cleanup materials employed (6.92 pounds per gallon).

- 1.e** Emission Limitation:
OC emissions shall not exceed 66.7 tons per year when coating non-metal parts and photochemically reactive materials (coatings and cleanup materials) are not employed.

Applicable Compliance Method:

This emission limitation is based on the emissions unit's potential to emit. The annual potential to emit was based on a maximum emissions rate of 65.7 tons per year from coating operations plus a maximum emissions rate of 1.0 ton per year from cleanup operations.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth #4 (R015)
Activity Description: Primer Spray Booth #4

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>
plastic automotive parts spray booth controlled with a water wash and baffles	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-21-07(G)	None, see Section A.II.1 below.
	OAC rule 3475-31-05 (PTI 03-13051)	Organic compound (OC) emissions shall not exceed 124.0 tons per year based upon a rolling, 12-month summation of the monthly OC input rates to emissions units R012, R013, R014, and R015. (See Section A.I.2.a below.)

2. Additional Terms and Conditions

- 2.a The monthly OC input rate for emissions units R012, R013, R014, and R015 equals the summation of (C)(D); where C is the number of gallons of each coating and cleanup material employed per month and D is the OC content of each coating and cleanup material employed, in pounds of OC per gallon of coating or cleanup material. The monthly OC input rates are equivalent to monthly OC emission rates and, in the absence of add-on controls, are based upon 100% of the solvent in the coating and/or cleanup materials being emitted.

II. Operational Restrictions

1. The permittee shall not employ any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.
2. The permittee shall operate the water wash and baffles when the emissions unit is in operation.

II. Operational Restrictions (continued)

3. To ensure federal enforceability, during the first 12 calendar months of operation following the issuance of PTI 03-3051, the permittee shall not exceed the following OC input rates (from coating and cleanup material usage) for emissions units R012, R013, R014, and R015 combined:

Month	Maximum Allowable Cumulative OC Input Rate (tons)
.	
1	21.6
1-2	43.2
1-3	64.8
1-4	86.4
1-5	108.0
1-6	124.0
1-7	124.0
1-8	124.0
1-9	124.0
1-10	124.0
1-11	124.0
1-12	124.0

After the first 12 calendar months of operation following the issuance of PTI 03-3051, compliance with the annual OC emission limitation of 124.0 tons shall be based upon a rolling, 12-month summation of the coating and cleanup material OC input rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating or cleanup material is a photochemically reactive material;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC content of each coating and cleanup material, in pounds per gallon, as applied;
 - e. the OC input rate for each coating and cleanup material, as applied, in tons per month $[(c) \times (d)/2000]$; and
 - f. the total OC input rate (emission rate) for all coating and cleanup materials, as applied, in tons per month [summation of (e)].
2. During the first 12 calendar months of operation following the issuance of PTI 03-3051, the permittee shall collect and record the cumulative OC input rate for each calendar month for emissions units R012, R013, R014, and R015, in tons.

Beginning after the first 12 calendar months of operation following the issuance of PTI 03-3051, the permittee shall collect and record the rolling, 12-month summation of the OC input rates for emissions units R012, R013, R014, and R015 combined, in tons.

3. 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 baffle exhaust filtration systems 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 notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of noncomplying coatings and/or cleanup materials (i.e., any coating or cleanup material which is a photochemically reactive material) in this emissions unit. 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 exceedance occurs.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation and, for the first 12 calendar months following the issuance of PTI 03-13051, all exceedances of the maximum allowable cumulative monthly OC input rates.
4. The permittee shall report the actual annual OC emissions from emissions units R012, R013, R014, and R015 in the fee emission report required pursuant to OAC rule 3745-78-02(A).

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I 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:

Particulate emissions 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:

$$E = (M) * (1-TE) * (1-CE)$$

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. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment (90% for the water wash and baffles).

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).

1.c Emission Limitation:

OC emissions shall not exceed 124.0 tons per year based upon a rolling, 12-month summation of the monthly OC input rates to emissions units R012, R013, R014, and R015.

Applicable Compliance Method:

Compliance with this emission limitation 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.d** The permittee shall determine the composition of the coating and/or cleanup material by formulation data supplied by the manufacturer of the coating and/or cleanup material, or from data determined by analysis of each coating and/or cleanup material, as received, in accordance with 40 CFR Part 60, Appendix A, Method 24.

Any determination of the OC content, solids content, or density of a coating and/or cleanup material shall be based upon the coating and/or cleanup material, as applied, including the addition of any thinner or viscosity reducer to the coating and/or cleanup material.

If required, the permittee shall determine the OC content of the coatings and/or cleanup materials, as applied, in accordance with 40 CFR Part 60, Appendix A, Method 24 or an equivalent or alternative method.

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>
plastic automotive parts spray booth controlled with a water wash and baffles	OAC rule 3745-31-05 (PTI 03-3051)	<p>OC emissions shall not exceed 15.0 pounds per hour, from the application of coating materials.</p> <p>OC emissions shall not exceed 173.0 pounds per month, from the application of cleanup materials.</p> <p>OC emissions shall not exceed 66.7 tons per year when coating non-metal parts and photochemically reactive materials (coatings and cleanup materials) are not employed.</p> <p>Particulate emissions shall not exceed 0.10 pound per hour and 0.44 ton per year.</p> <p>Visible particulate emissions shall not exceed 0% opacity, as a six-minute average.</p> <p>See Section B.I.2.a below.</p>

2. Additional Terms and Conditions

- 2.a The OC emission limitations specified in Section B.I.1 above were 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 these emission limitations.

II. Operational Restrictions

1. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application (PTI 03-3051) for this emissions unit. In addition to this emissions unit, emissions units R012, R013, and R014 were included in the modeling for air toxics since they emit the same pollutant and were 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 are 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: MIBK
TLV (ug/m3): 205,000
Maximum Hourly Emission Rate (lbs/hr): 15.00
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 670.7
MAGLC (ug/m3): 4880.0

OAC Chapter 3745-31 requires a permittee 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":

- a. changes in the composition of materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. change to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission rate specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. change in the composition of materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. 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.

The 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

1. Compliance with the emissions limitations specified in Section B.I shall be determined in accordance with the following methods:
 - 1.a Emission Limitations:
Particulate emissions shall not exceed 0.10 pound per hour and 0.44 ton per year.

Applicable Compliance Method:

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

$$E = (M) * (1-TE) * (1-CE)$$

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. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment (90% for the water wash and baffles).

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

Compliance with the annual particulate emission limitation will be assumed as long as compliance with the hourly particulate emission limitation is maintained. The annual emission limitation was established by multiplying the hourly particulate emission limitation by 8760 hours and dividing by 2000 pounds.

- 1.b Emission Limitation:
Visible particulate emissions shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

- 1.c Emission Limitation:
OC emissions shall not exceed 15.0 pounds per hour, from the application of coating materials.

Applicable Compliance Method:

This emission limitation is based on the emissions unit's potential to emit. The potential to emit was based on the emissions unit's maximum hourly coating usage rate (3.37 gallons) multiplied by the maximum OC content of the coatings employed (4.45 pounds per gallon).

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
OC emissions shall not exceed 173.0 pounds per month, from the application of cleanup materials.

Applicable Compliance Method:

This emission limitation is based on the emissions unit's potential to emit. The potential to emit was based on the emissions unit's maximum monthly cleanup usage rate (25 gallons) multiplied by the maximum OC content of the cleanup materials employed (6.92 pounds per gallon).

- 1.e** Emission Limitation:
OC emissions shall not exceed 66.7 tons per year when coating non-metal parts and photochemically reactive materials (coatings and cleanup materials) are not employed.

Applicable Compliance Method:

This emission limitation is based on the emissions unit's potential to emit. The annual potential to emit was based on a maximum emissions rate of 65.7 tons per year from coating operations plus a maximum emissions rate of 1.0 ton per year from cleanup operations.

VI. Miscellaneous Requirements

None

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