State of Ohio Environmental Protection Agency

Street Address:
1800 WaterMark Drive
Columbus, OH 43215-1099

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

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

07/23/98

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

02-04-01-0265
Zehrco Plastics Inc. (Plant 2)
Theador J Hebert
5500 Washington Ave.
Ashtabula, OH 44004-7100

Dear Theador J Hebert:

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 Northeast 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 Northeast District Office.

Very truly yours,

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

cc: USEPA
Jim Orlemann, DAPC Engineering
Michael Ahern, DAPC PMU
Northeast District Office
Pennsylvania
New York

Ohio EPA
State of Ohio Environmental Protection Agency

TITLE V PERMIT

Issue Date: 07/23/98

DRAFT

Effective Date:

Expiration Date:

This document constitutes issuance to:

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

of a Title V permit for Facility ID: 02-04-01-0265

Emissions Unit ID (Company ID)/
Emissions Unit Activity Description:
P001 (Old SMC (Sheet Molding Compound) Machine)
Manufacturing Molding FRP Compound

P002 (SMC Paste & BMC Mixing Operations)
Manufacture of SMC paste for use at SMC machines and BMC (Bulk Molding Compound) mixing

P003 (Eleven FRP Molding Presses)
Close FRP Molding Presses (Tenth and eleventh press Added to orignal 9/95) Used For Molding Plastic Parts From SMC & BMC

P004 (New SMC (Sheet Molding Compound) Machine)
Manufacturing Molding FRP Compound

P005 (BMC Mixer No.2)
BMC Mixing

R001 (Paint Spray Booth Four Compartment)
Spray Painting Of Fiberglass Reinforced Plastic Parts

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:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(216) 425-9171

OHIO ENVIRONMENTAL PROTECTION AGENCY

_____

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 <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
   iii. Written reports, which identify any deviations from the federally enforceable <u>monitoring</u>, <u>recordkeeping</u>, <u>and reporting requirements</u> contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

If 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**

No term or condition specifying a method for demonstrating compliance with any emission limitation or other requirement of this permit shall preclude the use by any person of any credible evidence to establish compliance with or a violation of this permit, the Clean Air Act, or any implementing regulations or rules promulgated thereunder.

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 <u>Federally Enforceable</u> Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

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

Z001 - Forced drying oven for painted plastic parts.
T001 - Tank No. 1, a 3333 gallon capacity above ground storage tank for polyester resin.
T002 - Tank No. 2, a 3333 gallon capacity above ground storage tank for polyester resin.

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: Old SMC (Sheet Molding Compound) Machine (P001)

Activity Description: Manufacturing Molding FRP Compound

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Old Sheet Molding Compound (SMC) Machine with a maximum production capacity of 3,100 lbs per hour. SMC paste and chopped fiber glass roving are cast onto a continuous nylon carrier film and are then covered by a nylon film for later use in the FRP molding presses.	OAC rule 3745-21-07(G)(2)	No more than 8.0 lbs/hr and 40.0 lbs/day of organic compounds.

2. Additional Terms and Conditions

2.a All of the SMC paste materials employed in this emissions unit are photochemically reactive materials as defined in OAC rule 3745-21-01.

2.b The permittee shall not employ any cleanup solvents in this emissions unit that are photochemically reactive materials, as defined in OAC rule 3745-21-01.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the old SMC Machine operation:

a. The number of pounds of each SMC paste material employed.

b. The organic compound content of each SMC paste, in percent, by weight.

c. The total organic compound emission rate from the operation of the old SMC machine, in pounds per day.

d. The total number of hours the emissions unit was in operation.

e. The average hourly organic compound emission rate from the operation of the old SMC machine, i.e., c/d, in pounds per hour (average).

[Note: The SMC paste information must be for the SMC paste as employed, including any thinning solvents or styrene monomer added at the emissions unit.]

IV. Reporting Requirements

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

a. An identification of each day during which the average hourly organic compound emissions from the old SMC machine exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.

b. An identification of each day during which the organic compound emissions from the old SMC machine exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

The total organic compound emission rate shall be determined by multiplying the total weight of SMC paste employed per day by the organic compound content of the SMC paste, by weight, and then multiplying by the 2.0% emission factor. (The 2.0% emission factor is from AP-42 Section 6.4.1 and is for solvent evaporative losses from paint manufacturing, the most analogous process for which there is a published emission factor.)

Formulation data or USEPA method 24 shall be used to determine the organic compound contents of the SMC paste.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: SMC Paste & BMC Mixing Operations (P002)

Activity Description: Manufacture of SMC paste for use at SMC machines and BMC (Bulk Molding Compound) mixing

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Sheet Molding Compound (SMC) paste and Bulk Molding Compound (BMC) mixing operation with a maximum production capacity of 3,100 lbs per hour. Including 1 Baker-Perkins, 2 Hockmeyer and 1 Cowles mixers for portable batch tanks.	OAC rule 3745-21-07(G)(2)	No more than 8.0 lbs/hr and 40.0 lbs/day of organic compounds.

2. Additional Terms and Conditions

2.a All of the SMC paste and BMC materials employed in this emissions unit are photochemically reactive materials as defined in OAC rule 3745-21-01.

2.b The permittee shall not employ any cleanup solvents in this emissions unit that are photochemically reactive materials, as defined in OAC rule 3745-21-01.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the SMC paste and BMC mixing operation:

a. The number of pounds of each SMC paste and BMC material mixed or employed.

b. The organic compound content of each SMC paste and BMC material, in percent, by weight.

c. The total organic compound emission rate from the SMC paste and BMC material mixing operation, in pounds per day.

d. The total number of hours the emissions unit was in operation.

e. The average hourly organic compound emission rate from the SMC paste and BMC material mixing operation, i.e., c/d, in pounds per hour (average).

[Note: The SMC paste and BMC material information must be for said materials as employed per batch, including any thinning solvents or styrene monomer added at the emissions unit.]

IV. Reporting Requirements

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

a. An identification of each day during which the average hourly organic compound emissions from the SMC paste and BMC material mixing operation exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.

b. An identification of each day during which the organic compound emissions from the SMC paste and BMC material mixing operation exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

The total organic compound emission rate shall be determined by multiplying the total weight of SMC paste and BMC material employed per day by the organic compound content of the material mixed, by weight, and then multiplying by the 2.0% emission factor. (The 2.0% emission factor is from AP-42 Section 6.4.1 and is for solvent evaporative losses from paint manufacturing, the most analogous process for which there is a published emission factor.)

Formulation data or USEPA method 24 shall be used to determine the organic compound contents of the SMC paste and BMC material.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Eleven FRP Molding Presses (P003)

Activity Description: Close FRP Molding Presses (Tenth and eleventh press Added to orignal 9/95) Used For Molding Plastic Parts From SMC & BMC

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Eleven closed molding presses to produce fiberglass reinforced plastic (FRP) parts from sheet molding compound (SMC) and bulk molding compound (BMC) materials, with a maximum production capacity of 1,450 lbs per hour.	OAC rule 3745-21-07(G)(2)	No more than 8.0 lbs/hr and 40.0 lbs/day of organic compounds.

2. Additional Terms and Conditions

2.a All of the SMC and BMC materials employed in this emissions unit are photochemically reactive materials as defined in OAC rule 3745-21-01.

2.b The permittee shall not employ any cleanup solvents in this emissions unit that are photochemically reactive materials, as defined in OAC rule 3745-21-01.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day that the closed molding FRP presses are in operation:

a. The number of pounds of each SMC and BMC material employed.

b. The organic compound content of each SMC and BMC material employed, in percent, by weight.

c. The total organic compound emission rate resulting from the operation of the 11 closed molding presses, in pounds per day.

d. The total number of hours the emissions unit was in operation.

e. The average hourly organic compound emission rate from all the SMC and BMC materials employed, i.e., c/d, in pounds per hour average).

[Note: The SMC and BMC material information must be for said materials as employed per batch, including any thinning solvents or styrene monomer added at the emissions units.]

IV. Reporting Requirements

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

a. An identification of each day during which the average hourly organic compound emissions resulting from the operation of the closed molding FRP presses exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.

b. An identification of each day during which the organic compound emissions resulting from the operation of the 11 closed molding FRP presses exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

The total organic compound emission rate shall be determined by multiplying the total weight of SMC and BMC materials employed per day by the organic compound content of the material mixed, by weight, and then multiplying by the 1.0% emission factor. (The 1.0% emission factor is from AP-42 Section 4.4, Table 4.4-2 for closed molding FRP processes using polyester resin.)

Formulation data or USEPA method 24 shall be used to determine the organic compound contents of the SMC and BMC materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: New SMC (Sheet Molding Compound) Machine (P004)

Activity Description: Manufacturing Molding FRP Compound

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
New Sheet Molding Compound (SMC) Machine with a maximum production capacity of 1,800 lbs per hour. SMC paste and chopped fiber glass roving are cast onto a continuous nylon carrier film and are then covered by a nylon film for later use in the FRP molding presses.	OAC rule 3745-21-07(G)(2)	No more than 8.0 lbs/hr and 40.0 lbs/day of organic compounds.

2. Additional Terms and Conditions

2.a All of the SMC paste materials employed in this emissions unit are photochemically reactive materials as defined in OAC rule 3745-21-01.

2.b The permittee shall not employ any cleanup solvents in this emissions unit that are photochemically reactive materials, as defined in OAC rule 3745-21-01.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the new SMC Machine operation:

a. The number of pounds of each SMC paste material employed.

b. The organic compound content of each SMC paste, in percent, by weight.

c. The total organic compound emission rate from the operation of the new SMC machine, in pounds per day.

d. The total number of hours the emissions unit was in operation.

e. The average hourly organic compound emission rate from the operation of the new SMC machine, i.e., c/d, in pounds per hour (average).

[Note: The SMC paste information must be for the SMC paste as employed, including any thinning solvents or styrene monomer added at the emissions unit.]

IV. Reporting Requirements

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

a. An identification of each day during which the average hourly organic compound emissions from the new SMC machine exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.

b. An identification of each day during which the organic compound emissions from the new SMC machine exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

The total organic compound emission rate shall be determined by multiplying the total weight of SMC paste employed per day by the organic compound content of the SMC paste, by weight, and then multiplying by the 2.0% emission factor. (The 2.0% emission factor is from AP-42 Section 6.4.1 and is for solvent evaporative losses from paint manufacturing, the most analogous process for which there is a published emission factor.)

Formulation data or USEPA method 24 shall be used to determine the organic compound contents of the SMC paste.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BMC Mixer No.2 (P005)

Activity Description: BMC Mixing

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Bulk Molding Compound (BMC) mixing operation with a maximum capacity of 610 lbs. per hour.	OAC rule 3745-21-07(G)(2)	No more than 8.0 lbs/hr and 40.0 lbs/day of organic compounds.

2. Additional Terms and Conditions

1. All of the BMC materials employed in this emissions unit are photochemically reactive materials as defined in OAC rule 3745-21-01.

2. The permittee shall not employ any cleanup solvents in this emissions unit that are photochemically reactive materials, as defined in OAC rule 3745-21-01.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the BMC mixing operation:

a. The number of pounds of each BMC material mixed or employed.

b. The organic compound content of each BMC material, in percent, by weight.

c. The total organic compound emission rate from the BMC material mixing operation, in pounds per day.

d. The total number of hours the emissions unit was in operation.

e. The average hourly organic compound emission rate from the from the BMC material mixing operation, i.e., c/d, in pounds per hour (average).

[Note: The BMC material information must be for said materials as employed per batch, including any thinning solvents or styrene monomer added at the emissions unit.]

IV. Reporting Requirements

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

a. An identification of each day during which the average hourly organic compound emissions from BMC material mixing operation exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.

b. An identification of each day during which the organic compound emissions from the BMC material mixing operation exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

The total organic compound emission rate shall be determined by multiplying the total weight of BMC material employed per day by the organic compound content of the material mixed, by weight, and then multiplying by the 2.0% emission factor. (The 2.0% emission factor is from AP-42 Section 6.4.1 and is for solvent evaporative losses from paint manufacturing, the most analagous process for which there is a published emission factor.)

Formulation data or USEPA method 24 shall be used to determine the organic compound contents of the BMC materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Spray Booth Four Compartment (R001)

Activity Description: Spray Painting Of Fiberglass Reinforced Plastic Parts

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Despatch 4-compartment paint spray booth with replacement filters used to coat molded fiberglass reinforced plastic (FRP) parts. Currently only non-photochemically reactive coating formulations are employed.	OAC rule 3745-21-07(G)(2)	No more than 8.0 lbs/hr and 40.0 lbs/day of organic compounds.
	OAC rule 3745-17-07	Visible particulate matter emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule
	OAC rule 3745-17-11	Emissions of particulate matter shall not exceed .551 pounds per hour

2. Additional Terms and Conditions

2.a The permittee shall not employ any cleanup solvents in this emissions unit that are photochemically reactive materials, as defined in OAC rule 3745-21-01.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:

a. The company identification for each coating and photochemically reactive cleanup material employed.

b. The number of gallons of each coating and photochemically reactive cleanup material employed.

c. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.

d. For each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day.

e. For each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation.

f. For each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., d/e, in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

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

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

IV. Reporting Requirements

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

a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day .

b. For the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the organic compounds emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

Daily recordkeeping of coating usage, organic compound content of each coating, operating hours, and hourly and daily emission rates shall be maintained. Formulation data or USEPA method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials.

2. Compliance with the visible emission limitation shall be determined by using U.S. EPA method 9, if required by the Ohio EPA.

3. Compliance with the particulate matter emission limitation of .551 pounds per hour shall be determined in accordance with OAC rule 3745-17-03(B)(10). No testing is specifically required by this permit but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A). Such testing may be required at opacity levels less than those required by the visible emissions limit in Section A.I.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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