



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

08/21/02

**RE: Proposed Title V Chapter 3745-77 Permit  
03-81-02-0017  
The Budd Co. -Plastics Div.**

Attn: Genevieve Damico AR-18J  
United States Environmental Protection Agency  
Region V  
77 West Jackson Blvd.  
Chicago, IL 60604-3590

Dear Ms. Damico:

The proposed issuance of the Title V permit for The Budd Co. -Plastics Div., has been created in Ohio EPA's State Air Resources System (STARS) on 08/21/02, for review by USEPA. This proposed action is identified in STARS as  3-Title V Proposed Permit +C covering the facility specific terms and conditions, and  Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact me at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: Northwest District Office  
File, DAPC PMU



State of Ohio Environmental Protection Agency

**PROPOSED TITLE V PERMIT**

Issue Date: 08/21/02

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 03-81-02-0017 to:  
The Budd Co. -Plastics Div.  
1276 Industrial Drive  
Van Wert, OH 45891-2466

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

P001 (SMC Machine #1) Sheet Molding Compound (SMC) manufacturing	P007 (Resin Mix Tank #3) Blending of resin solids with styrene	P011 (Cleaning Solvent Use) Use of cleaning solvent at the facility
P002 (SMC Machine #2) Sheet Molding Compound (SMC) manufacturing	P008 (Cowles Mixer #1) Cowles Mixer	P012 (Resin Mix Tank #5) Blending of resin solids with styrene
P005 (Resin Mix Tank #1) Blending of resin solids with styrene	P009 (SMC Machine #3) Sheet Molding Compound (SMC) manufacturing	P013 (Cowles Mixer #2) Cowles Mixer
P006 (Resin Mix Tank #2) Blending of resin solids with styrene	P010 (Resin Mix Tank #4) Blending of resin solids with styrene	

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 3745-77-08(E) 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 Record Keeping 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.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*

c. The permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

ii. **For emission limitations, operational restrictions, and control device operating parameter limitations:**

(a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring and record keeping requirements specified in this permit; (ii) the probable cause of such deviations; and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of

each deviation. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) ,(ii) and (iii))*

- (b) Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(iii))*

iii. **For monitoring, record keeping, and reporting requirements:**

Written reports that identify any deviations from the federally enforceable monitoring, record keeping, 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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, record keeping, 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.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))*

- 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

## **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 of any emissions unit(s) 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 OAC rule 3745-15-06, 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).

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))*

## **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.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

## **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.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

## **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.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

## **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, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

*(Authority for term: OAC rule 3745-77-07(A)(7))*

**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.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

**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.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

**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.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**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 (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the

permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.  
*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

#### **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.

*(Authority for term: OAC rule 3745-77-07(B))*

#### **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 Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA 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.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

### **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.

*(Authority for term: OAC rule 3745-77-07(F))*

#### **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).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

#### **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.

*(Authority for term: OAC rule 3745-77-07(G))*

#### **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 of the U.S. EPA, 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.
- 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 purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

*(Authority for term: OAC rule 3745-77-07(I))*

## **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.

*(This term is provided for informational purposes only.)*

## **18. Insignificant Activities**

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

## **19. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

## **20. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

## **B. State Only Enforceable Section**

### **1. Reporting Requirements Related to Monitoring and Record Keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping information shall be submitted to the 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, 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.)

## **2. 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.

## **3. 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.

## **4. 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).

**5. 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.

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

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

## **Part II - Specific Facility Terms and Conditions**

### **A. State and Federally Enforcable Section**

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

### **B. State Only Enforceable Section**

1. The following insignificant emissions unit is located at this facility:

T001 -Resin Storage Tank #1  
T002 -Resin Storage Tank #2  
T003 -Resin Storage Tank #3  
T004 -Resin Storage Tank #4  
T005 -Resin Storage Tank #5  
T006 -Resin Storage Tank #6  
T007 -Resin Storage Tank #7  
T008 -Resin Storage Tank #8  
T009 -Resin Storage Tank #9  
T010 -Resin Storage Tank #10  
T011 -Resin Storage Tank #11  
T012 -Resin Storage Tank #12  
T013 -Resin Storage Tank #13  
T014 -Resin Storage Tank #14  
P003 -Calcium Carbonate Storage Silos #s 1 & 2  
Z002 - #1 A-Side Mixer  
Z003 - #2 A-Side Mixer  
Z010 - #3 A-Side Mixer  
Z011 - #4 A-Side Mixer  
Z001 - Maturation Room  
Z004 - B-Side Mixer  
Z005 - QC Lab  
Z006 - Mix Tech Station  
Z007 - Bag Dump #1  
Z008 - Bag Dump #2  
Z009 - Mezzanine Fibr Filter #1  
Z014 - Mezzanine Fibr Filter #2  
Z012 - Cold Room #1  
Z013 - Cold Room #2

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:** SMC Machine #1 (P001)  
**Activity Description:** Sheet Molding Compound (SMC) manufacturing

#### 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>
sheet molding compound (SMC) machine #1	OAC rule 3745-31-05 (PTI #03-10232)	45.0 lbs organic compounds (OC)/day (excluding scrap SMC)
	(PTI #03-10787)	6.0 tons OC/month and 40.0 tons OC/year (for emissions units P001, P002 and P009, combined, from the generation, analysis and disposal of scrap SMC) [See A.1.2.a.]
	OAC rule 3745-21-07	none (See A.1.2.b.)

##### 2. Additional Terms and Conditions

- 2.a Emissions from scrap generation cannot be calculated on a per SMC machine basis; therefore, emissions units P001, P002, and P009 have a combined limit as stated in A.1.1 above.
- 2.b This emissions unit does not employ any liquid organic material, as defined in OAC rule 3745-21-01(C)(3). Therefore, there are no applicable regulations/emission limitations for this emissions unit under OAC rule 3745-21-07(G).

##### II. Operational Restrictions

1. The permittee shall implement, at a minimum, the following work practices to minimize OC emissions:
  - a. the prompt clean up of spills;
  - b. the prompt repair of leaks in any portion of the material handling process;
  - c. the covering of open containers whenever practical; and
  - d. minimizing the duration of time when organic materials are exposed to the air.

## II. Operational Restrictions (continued)

2. The permittee shall comply with the following:

- a. the final SMC product shall not exceed a monomer content of 18.5%\*, by weight; and
- b. the average exposure time of the SMC paste to air (prior to encasing in carrier film) shall not exceed 15 seconds.\*\*

\* The 18.5 % monomer content restriction was established for PTI purposes to reflect the highest monomer content found in any final SMC product. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this operational restriction.

\*\* The maximum exposure time of the SMC paste to the air is based on the line speed of this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance this operational restriction.

## III. Monitoring and/or Record Keeping Requirements

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

- a. the company identification of each SMC produced;
- b. the weight of each SMC produced, in tons, excluding scrap SMC;
- c. the weight of all the SMC produced, in tons, excluding scrap SMC; and
- d. the total OC emission rate for all the SMC produced, excluding scrap SMC, in pounds [(0.254 lb OC/ton of product produced\*) x (weight of all SMC produced, excluding SMC scrap, from section 1.c above)].

\* This is a company-supplied emission factor based on the average monomer content and the average exposure time of the final SMC product.

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

2. The permittee shall collect and record the following information each month for emissions units P001, P002 and P009, combined:
  - a. the company identification for each type of scrap SMC generated;
  - b. the monomer content for each type of scrap SMC generated, in percent by weight;
  - c. the weight of each scrap SMC generated, in tons;
  - d. the weight of all the scrap SMC generated, in tons;
  - e. the average monomer content for all the scrap SMC generated, in weight percent [(summation of (2.b x 2.c), divided by 2.d) x 100%];
  - f. the total OC emissions from all the scrap SMC generated, in tons [(0.40\* x the weight of all the scrap SMC generated, from section 2.d) x (the average monomer content for all the scrap SMC generated, from section 2.e)];
  - g. the total OC emissions, in tons, generated from spills/leaks, small storage containers, other miscellaneous material handling operations and from scrap generation such as: square foot retains, spiral flow, paste cans, off-spec SMC, SMC machine scrap, and rejected SMC (these calculations shall be done in a manner consistent with those developed for SARA 313 reporting requirements); and
  - h. the total OC emissions, in tons (2.f + 2.g).

\* This represents an established loss rate of 40%.
3. The permittee shall collect and record the annual OC emissions from all the scrap SMC generated, in tons, for emissions units P001, P002 and P009, combined (the annual OC emissions shall be the sum of the 12 monthly OC emission rates (from section 2.h) for the calendar year).

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the daily OC emission limitation of 45 pounds; and
  - b. all exceedances of the monthly OC emission limitation of 6.0 tons.

The quarterly deviation reports required above, shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

2. The permittee shall submit annual reports that specify the total OC emissions from all the scrap SMC generated from emissions units P001, P002 and P009. These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A).

## **V. Testing Requirements**

1. Compliance with the emission limitations of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
45.0 pounds OC/day  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in condition A.III.2 of this permit.
  - b. Emission Limitations-  
6.0 tons OC/month and 40.0 tons OC/ year (for emissions unit P001, P002 and P009, combined)  
  
Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in conditions A.III.3 and A.III.4 of this permit.
2. Formulation data or USEPA's Method 24 shall be used to determine the OC contents for all the materials.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

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

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** SMC Machine #2 (P002)  
**Activity Description:** Sheet Molding Compound (SMC) manufacturing

#### 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>
sheet molding compound (SMC) machine #2	OAC rule 3745-31-05 (PTI #03-10232)	45.0 lbs organic compounds (OC)/day (excluding scrap SMC)
	(PTI #03-10787)	6.0 tons OC/month and 40.0 tons OC/year (for emissions units P001, P002 and P009, combined, from the generation, analysis and disposal of scrap SMC) [See A.1.2.a.]
	OAC rule 3745-21-07	none (See A.1.2.b.)

##### 2. Additional Terms and Conditions

- 2.a Emissions from scrap generation cannot be calculated on a per SMC machine basis; therefore, emissions units P001, P002, and P009 have a combined limit as stated in A.I.1 above.
- 2.b This emissions unit does not employ any liquid organic material, as defined in OAC rule 3745-21-01(C)(3). Therefore, there are no applicable regulations/emission limitations for this emissions unit under OAC rule 3745-21-07(G).

##### II. Operational Restrictions

1. The permittee shall implement, at a minimum, the following work practices to minimize OC emissions:
  - a. the prompt clean up of spills;
  - b. the prompt repair of leaks in any portion of the material handling process;
  - c. the covering of open containers whenever practical; and
  - d. minimizing the duration of time when organic materials are exposed to the air.

## II. Operational Restrictions (continued)

2. The permittee shall comply with the following:

- a. the final SMC product shall not exceed a monomer content of 18.5%\*, by weight; and
- b. the average exposure time of the SMC paste to air (prior to encasing in carrier film) shall not exceed 15 seconds.\*\*

\* The 18.5 % monomer content restriction was established for PTI purposes to reflect the highest monomer content found in any final SMC product. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this operational restriction.

\*\* The maximum exposure time of the SMC paste to the air is based on the line speed of this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance this operational restriction.

## III. Monitoring and/or Record Keeping Requirements

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

- a. the company identification of each SMC produced;
- b. the weight of each SMC produced, in tons, excluding scrap SMC;
- c. the weight of all the SMC produced, in tons, excluding scrap SMC; and
- d. the total OC emission rate for all the SMC produced, excluding scrap SMC, in pounds [(0.254 lb OC/ton of product produced\*) x (weight of all SMC produced, excluding SMC scrap, from section 1.c above)].

\* This is a company-supplied emission factor based on the average monomer content and the average exposure time of the final SMC product.

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

2. The permittee shall collect and record the following information each month for emissions units P001, P002 and P009, combined:
  - a. the company identification for each type of scrap SMC generated;
  - b. the monomer content for each type of scrap SMC generated, in percent by weight;
  - c. the weight of each scrap SMC generated, in tons;
  - d. the weight of all the scrap SMC generated, in tons;
  - e. the average monomer content for all the scrap SMC generated, in weight percent [(summation of (2.b x 2.c), divided by 2.d) x 100%];
  - f. the total OC emissions from all the scrap SMC generated, in tons [(0.40\* x the weight of all the scrap SMC generated, from section 2.d) x (the average monomer content for all the scrap SMC generated, from section 2.e)];
  - g. the total OC emissions, in tons, generated from spills/leaks, small storage containers, other miscellaneous material handling operations and from scrap generation such as: square foot retains, spiral flow, paste cans, off-spec SMC, SMC machine scrap, and rejected SMC (these calculations shall be done in a manner consistent with those developed for SARA 313 reporting requirements); and
  - h. the total OC emissions, in tons (2.f + 2.g).

\* This represents an established loss rate of 40%.
3. The permittee shall collect and record the annual OC emissions from all the scrap SMC generated, in tons, for emissions units P001, P002 and P009, combined (the annual OC emissions shall be the sum of the 12 monthly OC emission rates (from section 2.h) for the calendar year).

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the daily OC emission limitation of 45 pounds; and
  - b. all exceedances of the monthly OC emission limitation of 6.0 tons.

The quarterly deviation reports required above, shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

2. The permittee shall submit annual reports that specify the total OC emissions from all the scrap SMC generated from emissions units P001, P002 and P009. These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A).

## **V. Testing Requirements**

1. Compliance with the emission limitations of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
45.0 pounds OC/day  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in condition A.III.2 of this permit.
  - b. Emission Limitations-  
6.0 tons OC/month and 40.0 tons OC/ year (for emissions unit P001, P002 and P009, combined)  
  
Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in conditions A.III.3 and A.III.4 of this permit.
2. Formulation data or USEPA's Method 24 shall be used to determine the OC contents for all the materials.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

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

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Resin Mix Tank #1 (P005)  
**Activity Description:** Blending of resin solids with styrene

#### 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>
resin mix tank #1	OAC rule 3745-31-05(A)(3) (PTI #03-8924)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	8.0 lbs organic compounds (OC)/hr 40.0 lbs OC/day

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

1. The permittee shall implement, at minimum, the following work practices to minimize OC emissions:
  - a. the prompt clean up of spills;
  - b. the prompt repair of leaks in any portion of the material handling process;
  - c. the covering of open containers whenever practical; and
  - d. minimizing the duration of time when organic materials are exposed to the air.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the company identification of each product and each batch produced;
  - b. the total duration of each batch, including the start and stop time of each batch (see note below);
  - c. the weight, in tons, of each product produced;
  - d. the weight, in tons, of all the products produced;
  - e. the total OC emissions from all the products produced, in pounds [1.75 lbs OC/ton of product]\* x [weight of all products, from section 1.d];
  - f. the number of hours the emissions unit was in operation; and
  - g. the average hourly OC emission rate [(e)/(f)], in pounds per hour (average).

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

Note: This emissions unit is a batch operation where a batch may begin in one calendar day and finish in the next. The emissions from that batch are considered to be proportional to the duration of the batch attributed to that day, i.e., if the batch was 8 hours in duration and two hours were in the first day and six hours were in the next, 25% (2/8) of the emissions would be included in the first day and 75% (6/8) would be included in the second day.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that include the following information:
  - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
  - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

### V. Testing Requirements

1. Compliance with the emission limitations of this permit shall be determined in accordance with the following methods:

Emission Limitations:

8.0 lbs OC/hr

40.0 lbs OC/day

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in condition A.III.1 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Resin Mix Tank #2 (P006)  
**Activity Description:** Blending of resin solids with styrene

#### 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>
resin mix tank #2	OAC rule 3745-31-05(A)(3) (PTI #03-8924)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	8.0 lbs organic compounds (OC)/hr 40.0 lbs OC/day

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

1. The permittee shall implement, at minimum, the following work practices to minimize OC emissions:
  - a. the prompt clean up of spills;
  - b. the prompt repair of leaks in any portion of the material handling process;
  - c. the covering of open containers whenever practical; and
  - d. minimizing the duration of time when organic materials are exposed to the air.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the company identification of each product and each batch produced;
  - b. the total duration of each batch, including the start and stop time of each batch (see note below);
  - c. the weight, in tons, of each product produced;
  - d. the weight, in tons, of all the products produced;
  - e. the total OC emissions from all the products produced, in pounds [1.33 lbs OC/ton of product]\* x [weight of all products, from section 1.d];
  - f. the number of hours the emissions unit was in operation; and
  - g. the average hourly OC emission rate [(e)/(f)], in pounds per hour (average).

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

Note: This emissions unit is a batch operation where a batch may begin in one calendar day and finish in the next. The emissions from that batch are considered to be proportional to the duration of the batch attributed to that day, i.e., if the batch was 8 hours in duration and two hours were in the first day and six hours were in the next, 25% (2/8) of the emissions would be included in the first day and 75% (6/8) would be included in the second day.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that include the following information:
  - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
  - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

### V. Testing Requirements

1. Compliance with the emission limitations of this permit shall be determined in accordance with the following methods:

Emission Limitations:

8.0 lbs OC/hr

40.0 lbs OC/day

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in condition A.III.1 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Resin Mix Tank #3 (P007)  
**Activity Description:** Blending of resin solids with styrene

#### 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>
resin mix tank #3	OAC rule 3745-31-05(A)(3) (PTI #03-8924)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	8.0 lbs organic compounds (OC)/hr 40.0 lbs OC/day

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

1. The permittee shall implement, at minimum, the following work practices to minimize OC emissions:
  - a. the prompt clean up of spills;
  - b. the prompt repair of leaks in any portion of the material handling process;
  - c. the covering of open containers whenever practical; and
  - d. minimizing the duration of time when organic materials are exposed to the air.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the company identification of each product and each batch produced;
  - b. the total duration of each batch, including the start and stop time of each batch (see note below);
  - c. the weight, in tons, of each product produced;
  - d. the weight, in tons, of all the products produced;
  - e. the total OC emissions from all the products produced, in pounds [4.0 lbs OC/ton of product]\* x [weight of all products, from section 1.d];
  - f. the number of hours the emissions unit was in operation; and
  - g. the average hourly OC emission rate [(e)/(f)], in pounds per hour (average).

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

Note: This emissions unit is a batch operation where a batch may begin in one calendar day and finish in the next. The emissions from that batch are considered to be proportional to the duration of the batch attributed to that day, i.e., if the batch was 8 hours in duration and two hours were in the first day and six hours were in the next, 25% (2/8) of the emissions would be included in the first day and 75% (6/8) would be included in the second day.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that include the following information:
  - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
  - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

### V. Testing Requirements

1. Compliance with the emission limitations of this permit shall be determined in accordance with the following methods:

Emission Limitations:

8.0 lbs OC/hr

40.0 lbs OC/day

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in condition A.III.1 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Cowles Mixer #1 (P008)

**Activity Description:** Cowles Mixer

#### 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>
Cowles mixer #1	OAC rule 3745-31-05(A)(3) (PTI #03-8924)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	8.0 lbs organic compounds (OC)/hr 40.0 lbs OC/day

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

1. The permittee shall implement, at minimum, the following work practices to minimize OC emissions:
  - a. the prompt clean up of spills;
  - b. the prompt repair of leaks in any portion of the material handling process;
  - c. the covering of open containers whenever practical; and
  - d. minimizing the duration of time when organic materials are exposed to the air.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the company identification of each product and each batch produced;
  - b. the total duration of each batch, including the start and stop time of each batch (see note below);
  - c. the weight, in tons, of each product produced;
  - d. the weight, in tons, of all the products produced;
  - e. the total OC emissions from all the products produced, in pounds [E lbs OC/ton of product]\* x [weight of all products, from section 1.d];
  - f. the number of hours the emissions unit was in operation; and
  - g. the average hourly OC emission rate [(e)/(f)], in pounds per hour (average).

\* Where E = 6.0 for misc. pastes and E = 10.0 for "B-side" pastes. This emission factor is based on information supplied by the permittee.

Note: This emissions unit is a batch operation where a batch may begin in one calendar day and finish in the next. The emissions from that batch are considered to be proportional to the duration of the batch attributed to that day, i.e., if the batch was 8 hours in duration and two hours were in the first day and six hours were in the next, 25% (2/8) of the emissions would be included in the first day and 75% (6/8) would be included in the second day.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that include the following information:
  - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
  - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

### V. Testing Requirements

1. Compliance with the emission limitations of this permit shall be determined in accordance with the following methods:

Emission Limitations:

8.0 lbs OC/hr

40.0 lbs OC/day

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in condition A.III.1 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** SMC Machine #3 (P009)  
**Activity Description:** Sheet Molding Compound (SMC) manufacturing

#### 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>
sheet molding compound (SMC) machine #2	OAC rule 3745-31-05 (PTI #03-10232)	45.0 lbs organic compounds (OC)/day (excluding scrap SMC)
	(PTI #03-10787)	6.0 tons OC/month and 40.0 tons OC/year (for emissions units P001, P002 and P009, combined, from the generation, analysis and disposal of scrap SMC) [See A.1.2.a.]
	OAC rule 3745-21-07	none (See A.1.2.b.)

##### 2. Additional Terms and Conditions

- 2.a Emissions from scrap generation cannot be calculated on a per SMC machine basis; therefore, emissions units P001, P002, and P009 have a combined limit as stated in A.1.1 above.
- 2.b This emissions unit does not employ any liquid organic material, as defined in OAC rule 3745-21-01(C)(3). Therefore, there are no applicable regulations/emission limitations for this emissions unit under OAC rule 3745-21-07(G).

##### II. Operational Restrictions

1. The permittee shall implement, at a minimum, the following work practices to minimize OC emissions:
  - a. the prompt clean up of spills;
  - b. the prompt repair of leaks in any portion of the material handling process;
  - c. the covering of open containers whenever practical; and
  - d. minimizing the duration of time when organic materials are exposed to the air.

## II. Operational Restrictions (continued)

2. The permittee shall comply with the following:
  - a. the final SMC product shall not exceed a monomer content of 18.5%\*, by weight; and
  - b. the average exposure time of the SMC paste to air (prior to encasing in carrier film) shall not exceed 15 seconds.\*\*

\* The 18.5 % monomer content restriction was established for PTI purposes to reflect the highest monomer content found in any final SMC product. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this operational restriction.

\*\* The maximum exposure time of the SMC paste to the air is based on the line speed of this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance this operational restriction.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit :
  - a. the company identification of each SMC produced;
  - b. the weight of each SMC produced, in tons, excluding scrap SMC;
  - c. the weight of all the SMC produced, in tons, excluding scrap SMC; and
  - d. the total OC emission rate for all the SMC produced, excluding scrap SMC, in pounds [(0.254 lb OC/ton of product produced\*) x (weight of all SMC produced, excluding SMC scrap, from section 1.c above)].

\* This is a company-supplied emission factor based on the average monomer content and the average exposure time of the final SMC product.

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

2. The permittee shall collect and record the following information each month for emissions units P001, P002 and P009, combined:
  - a. the company identification for each type of scrap SMC generated;
  - b. the monomer content for each type of scrap SMC generated, in percent by weight;
  - c. the weight of each scrap SMC generated, in tons;
  - d. the weight of all the scrap SMC generated, in tons;
  - e. the average monomer content for all the scrap SMC generated, in weight percent [(summation of (2.b x 2.c), divided by 2.d) x 100%];
  - f. the total OC emissions from all the scrap SMC generated, in tons [(0.40\* x the weight of all the scrap SMC generated, from section 2.d) x (the average monomer content for all the scrap SMC generated, from section 2.e)];
  - g. the total OC emissions, in tons, generated from spills/leaks, small storage containers, other miscellaneous material handling operations and from scrap generation such as: square foot retains, spiral flow, paste cans, off-spec SMC, SMC machine scrap, and rejected SMC (these calculations shall be done in a manner consistent with those developed for SARA 313 reporting requirements); and
  - h. the total OC emissions, in tons (2.f + 2.g).

\* This represents an established loss rate of 40%.
3. The permittee shall collect and record the annual OC emissions from all the scrap SMC generated, in tons, for emissions units P001, P002 and P009, combined (the annual OC emissions shall be the sum of the 12 monthly OC emission rates (from section 2.h) for the calendar year).

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the daily OC emission limitation of 45 pounds; and
  - b. all exceedances of the monthly OC emission limitation of 6.0 tons.

The quarterly deviation reports required above, shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

2. The permittee shall submit annual reports that specify the total OC emissions from all the scrap SMC generated from emissions units P001, P002 and P009. These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A).

**V. Testing Requirements**

1. Compliance with the emission limitations of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:  
45.0 pounds OC/day

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in condition A.III.2 of this permit.

- b. Emission Limitations-  
6.0 tons OC/month and 40.0 tons OC/ year (for emissions unit P001, P002 and P009, combined)

Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in conditions A.III.3 and A.III.4 of this permit.

2. Formulation data or USEPA's Method 24 shall be used to determine the OC contents for all the materials.

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

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

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Resin Mix Tank #4 (P010)  
**Activity Description:** Blending of resin solids with styrene

**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>
resin mix tank #4	OAC rule 3745-31-05(A)(3) (PTI #03-10232)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	8.0 lbs organic compounds (OC)/hr 40.0 lbs OC/day

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

1. The permittee shall implement, at minimum, the following work practices to minimize OC emissions:
  - a. the prompt clean up of spills;
  - b. the prompt repair of leaks in any portion of the material handling process;
  - c. the covering of open containers whenever practical; and
  - d. minimizing the duration of time when organic materials are exposed to the air.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the company identification of each product and each batch produced;
  - b. the total duration of each batch, including the start and stop time of each batch (see note below);
  - c. the weight, in tons, of each product produced;
  - d. the weight, in tons, of all the products produced;
  - e. the total OC emissions from all the products produced, in pounds [4.0 lbs OC/ton of product]\* x [weight of all products, from section 1.d];
  - f. the number of hours the emissions unit was in operation; and
  - g. the average hourly OC emission rate [(e)/(f)], in pounds per hour (average).

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

Note: This emissions unit is a batch operation where a batch may begin in one calendar day and finish in the next. The emissions from that batch are considered to be proportional to the duration of the batch attributed to that day, i.e., if the batch was 8 hours in duration and two hours were in the first day and six hours were in the next, 25% (2/8) of the emissions would be included in the first day and 75% (6/8) would be included in the second day.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that include the following information:
  - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
  - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

### V. Testing Requirements

1. Compliance with the emission limitations of this permit shall be determined in accordance with the following methods:

Emission Limitations:

8.0 lbs OC/hr

40.0 lbs OC/day

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in condition A.III.1 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Cleaning Solvent Use (P011)  
**Activity Description:** Use of cleaning solvent at the facility

#### 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>
facility cleaning solvent usage	OAC rule 3745-31-05(A)(3) (PTI #03-10787)	2000 lbs organic compounds (OC)/month 12.0 tons OC/year  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-21-07(G)	none (See A.II.1.)

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the company identification of each cleanup material employed;
  - b. the number of gallons of each cleanup material employed;
  - c. documentation on whether or not each cleanup material employed is a photochemically reactive material.
  - d. the OC content of each cleanup material employed, in pounds per gallon;
  - e. the amount, in gallons, of each waste cleanup material (excluding solids) sent off site for disposal/reclamation; and
  - f. the total OC emissions for all the cleanup materials employed {summation of [(1.b - 1.e) x 1.d] for all cleanup materials}, in pounds.

Note: If waste cleanup material is sent off site on a quarterly basis, the company may back calculate the monthly gallons sent off site by dividing the quarterly amount by three.
2. The permittee shall collect and record the OC emissions, in tons, for each year for this emissions unit (the annual OC emissions shall be calculated by summing the monthly OC emission rates, from section 1.f, for the calendar year).

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which noncomplying (i.e., photochemically reactive) cleanup materials were employed in this emissions unit.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation of 2,000 pounds.
3. The quarterly deviation reports required above, shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

### V. Testing Requirements

1. Compliance with the emission limitations of this permit shall be determined in accordance with the following methods:

Emission Limitations:  
2000 lbs OC/month and 12.0 tons OC/year

Applicable Compliance Method:  
Compliance with the OC limitations above shall be based upon the record keeping requirements specified in conditions A.III.1 and 2 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>
facility cleaning solvent usage	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since this emissions unit did not contribute to the emissions of any toxic compound of greater than 1.0 ton/yr. 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 OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Resin Mix Tank #5 (P012)  
**Activity Description:** Blending of resin solids with styrene

#### 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>
resin mix tank #5	OAC rule 3745-31-05(A)(3) (PTI #03-10787)	2.5 lbs organic compounds (OC)/hr, 40.0 lbs OC/day, and 7.3 tons OC/yr
	OAC rule 3745-21-07(G)	See A.I.2.a.

##### 2. Additional Terms and Conditions

- 2.a The emission limitations established by this rule are as stringent as or less stringent than the emission limitations specified by OAC rule 3745-31-05(A)(3).

##### II. Operational Restrictions

1. The permittee shall implement, at minimum, the following work practices to minimize OC emissions:
  - a. the prompt clean up of spills;
  - b. the prompt repair of leaks in any portion of the material handling process;
  - c. the covering of open containers whenever practical; and
  - d. minimizing the duration of time when organic materials are exposed to the air.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the company identification of each product and each batch produced;
  - b. the total duration of each batch, including the start and stop time of each batch (see note below);
  - c. the weight, in tons, of each product produced;
  - d. the weight, in tons, of all the products produced;
  - e. the total OC emissions from all the products produced, in pounds [4.0 lbs OC/ton of product]\* x [weight of all products, from section 1.d];
  - f. the number of hours the emissions unit was in operation; and
  - g. the average hourly OC emission rate [(e)/(f)], in pounds per hour (average).

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

Note: This emissions unit is a batch operation where a batch may begin in one calendar day and finish in the next. The emissions from that batch are considered to be proportional to the duration of the batch attributed to that day, i.e., if the batch was 8 hours in duration and two hours were in the first day and six hours were in the next, 25% (2/8) of the emissions would be included in the first day and 75% (6/8) would be included in the second day.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that include the following information:
  - a. an identification of each day during which the average hourly organic compound emissions exceeded 2.5 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
  - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

### V. Testing Requirements

1. Compliance with the emission limitations of this permit shall be determined in accordance with the following methods:

Emission Limitations:

2.5 lbs OC/hr  
40.0 lbs OC/day  
7.3 tons OC/yr

Applicable Compliance Method:

Compliance with the hourly and daily OC limitations above shall be based upon the record keeping requirements specified in condition A.III.1 of this permit.

Provided compliance is shown with the daily allowable OC emission limitation, compliance with the annual limitation shall be ensured (the annual allowable limitation was developed by multiplying the daily allowable limitation by 365, and then dividing by 2000).

Facility Name: **The Budd Company Plastics Division, Van Wert**  
Facility ID: **03-81-02-0017**  
Emissions Unit: **Resin Mix Tank #5 (P012)**

**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>
resin mix tank #5	none	none

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

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

Pollutant: styrene  
 TLV (mg/m3): 213  
 Maximum Hourly Emission Rate (lbs/hr): 11.4\*  
 Predicted 1-hour Maximum Ground-Level Concentration (mg/m3): 2.30  
 MAGLC (mg/m3): 5.07

\* This represents the combined emissions for the emissions units contained in PTI #03-10787.

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - 2.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 previously modeled;
  - 2.b changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

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

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

- 3.** The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- 3.a** a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- 3.b** documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- 3.c** where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Cowles Mixer #2 (P013)

**Activity Description:** Cowles Mixer

#### 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>
Cowles mixer #2	OAC rule 3745-31-05(A)(3) (PTI #03-10787)	2.0 lbs organic compounds (OC)/hr, 40.0 lbs OC/day, and 7.3 tons OC/yr
	OAC rule 3745-21-07(G)	See A.I.2.a.

##### 2. Additional Terms and Conditions

- 2.a The emission limitations established by this rule are as stringent as or less stringent than the emission limitations specified by OAC rule 3745-31-05(A)(3).

##### II. Operational Restrictions

1. The permittee shall implement, at minimum, the following work practices to minimize OC emissions:
  - a. the prompt clean up of spills;
  - b. the prompt repair of leaks in any portion of the material handling process;
  - c. the covering of open containers whenever practical; and
  - d. minimizing the duration of time when organic materials are exposed to the air.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the company identification of each product and each batch produced;
  - b. the total duration of each batch, including the start and stop time of each batch (see note below);
  - c. the weight, in tons, of each product produced;
  - d. the weight, in tons, of all the products produced;
  - e. the total OC emissions from all the products produced, in pounds [E lbs OC/ton of product]\* x [weight of all products, from section 1.d];
  - f. the number of hours the emissions unit was in operation; and
  - g. the average hourly OC emission rate [(e)/(f)], in pounds per hour (average).

\* Where E = 6.0 for masc. pastes and E = 10.0 for "B-side" pastes. This emission factor is based on information supplied by the permittee.

Note: This emissions unit is a batch operation where a batch may begin in one calendar day and finish in the next. The emissions from that batch are considered to be proportional to the duration of the batch attributed to that day, i.e., if the batch was 8 hours in duration and two hours were in the first day and six hours were in the next, 25% (2/8) of the emissions would be included in the first day and 75% (6/8) would be included in the second day.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with Section A.1.c.ii. of Part I of the General Terms and Conditions of this permit, that include the following information:
  - a. an identification of each day during which the average hourly organic compound emissions exceeded 2 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
  - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

### V. Testing Requirements

1. Compliance with the emission limitations of this permit shall be determined in accordance with the following methods:

Emission Limitations:

2.0 lbs OC/hr  
40.0 lbs OC/day  
7.3 tons OC/yr

Applicable Compliance Method:

Compliance with the hourly and daily OC limitations above shall be based upon the record keeping requirements specified in condition A.III.1 of this permit.

Provided compliance is shown with the daily allowable OC emission limitation, compliance with the annual limitation shall be ensured (the annual allowable limitation was developed by multiplying the daily allowable limitation by 365, and then dividing by 2000).

Facility Name: **The Budd Company Plastics Division, Van Wert**  
Facility ID: **03-81-02-0017**  
Emissions Unit: **Cowles Mixer #2 (P013)**

## **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>
Cowles mixer #2	none	none

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

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

Pollutant: styrene  
 TLV (mg/m3): 213  
 Maximum Hourly Emission Rate (lbs/hr): 11.4\*  
 Predicted 1-hour Maximum Ground-Level Concentration (mg/m3): 2.30  
 MAGLC (mg/m3): 5.07

\* This represents the combined emissions for the emissions units contained in PTI #03-10787.

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - 2.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 previously modeled;
  - 2.b changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

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

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

- 3.** The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- 3.a** a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- 3.b** documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- 3.c** where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

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