



State of Ohio Environmental Protection Agency

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07/31/02

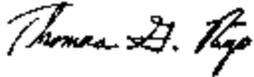
**RE: Proposed Title V Chapter 3745-77 Permit
03-87-00-0042
The Budd Company Plastics Division, North
Baltimore**

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 Company Plastics Division, North Baltimore, has been created in Ohio EPA's State Air Resources System (STARS) on 07/31/02, 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 Mike Ahern, DAPC Permit Management Unit supervisor 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,



Thomas G. Rigo, Manager
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: 07/31/02

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: 03-87-00-0042 to:
The Budd Company Plastics Division, North Baltimore
100 South Poe Road
P.O. Box 277
North Baltimore, OH 45872

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

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and Emissions Unit Activity Description. Rows include units P009 through P031 and R012 through R015, detailing activities like compression molding and secondary finishing operations.

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.

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 Enforceable Section

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

B. State Only Enforceable Section

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

B001 - 4.2 mmBtu/hr, natural gas/propane boiler (Boiler #1);
B002 - 4.2 mmBtu/hr, natural gas/propane boiler (Boiler #2);
B003 - 7.3 mmBtu/hr, natural gas/propane boiler (Boiler #3);
B004 - Air Make Up #1 (5.6 mmBtu/hr);
B005 - Air Make Up #2 (4.5 mmBtu/hr);
B006 - Air Make Up #3 (5.6 mmBtu/hr);
B007 - Air Make Up #4 (6.3 mmBtu/hr);
P006 - Primer System Dry Off Oven;
P007 - Primer System Bake Oven;
P008 - Heated Plastic Parts Washer;
Z001 - Bonding Area A (adhesive removal/cleaning);
Z002 - Bonding Area B (adhesive removal/cleaning);
Z003 - Bonding Area C (adhesive removal/cleaning);
Z004 - Bonding Area D (adhesive removal/cleaning);
Z005 - Bonding Area E (adhesive removal/cleaning);
Z006 - Bonding Area F (adhesive removal/cleaning);
Z007 - Bonding Area G (adhesive removal/cleaning);
Z008 - Bonding Area H (adhesive removal/cleaning);
Z009 - Edge Seal #1 (edge sealer application);
Z010 - Paint Inspection and Touch Up Area A;
Z011 - Paint Inspection and Touch Up Area B;
Z012 - Paint Inspection and Touch Up Area C;
Z013 - Paint Inspection and Touch Up Area D;
Z014 - Paint Inspection and Touch Up Area E;
Z015 - Paint Inspection and Touch Up Area F;
Z016 - Paint Inspection and Touch Up Area G;
Z017 - Paint Inspection and Touch Up Area H;
Z018 - Paint Mix Room;
Z019 - Tech Mix Room (touch up paint mixing/cleanup);
Z020 - RRIM Clamp Area A (molding operation);
Z021 - RRIM Clamp Area B (molding operation);
Z022 - RRIM Clamp Area C (molding operation);
Z023 - RRIM Clamp Area D (molding operation);
Z024 - RRIM Clamp Area E (molding operation);
Z025 - RRIM Clamp Area F (molding operation);
Z026 - RRIM Clamp Area G (molding operation);
Z027 - QC Test Oven;
Z028 - RRIM Postcure Oven;
Z029 - Paint Storage Room;
Z030 - Sound Dampener Area;
Z031 - Sound Dampener Oven;
Z032 - Bonding Area I; and
Z033 - Bonding Area J.

B. State Only Enforceable Section (continued)

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

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press Area #1 (P009)

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #1	OAC rule 3745-31-05 (PTI 03-13396)	compression molding- 1.26 lbs organic compound (OC)/hour, 4.20 tons OC/year (See A.1.2.a and A.1.2.c.)
	OAC rule 3745-31-02(A) (PTI #03-13396)	combined limit of 38.60 tons OC/rolling, 12-month period (See A.1.2.b.)
		scrap generation- combined limit of 37.10 tons OC/rolling, 12-month period (See A.1.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-02(A)(2).
- 2.b The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions (see A.II.1) and are being established for the purposes of maintaining the facility's status as a PSD "minor".
- 2.c The 1.26 lbs OC/hr and 4.20 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.

II. Operational Restrictions

1. The maximum annual SMC usage for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed any of the following:
 - a. 2,000,000 lbs of preheated SMC;*
 - b. 37,100,000 lbs of non-preheated SMC;* and
 - c. 37,100,000 lbs of all SMC combined (preheated and non-preheated).*

*The annual SMC usage restriction shall be based upon a rolling, 12-month summation of the monthly SMC input rates.

2. The maximum annual scrap generation for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed 37,100,000 lbs per rolling, 12-month period.
3. Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the usage restrictions in condition A.II.1. and the allowable OC emission limitation of 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

- 1.a the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;
- 1.b the total mass of raw SMC preheated before use in all compression molding presses, in pounds;
- 1.c the total mass of raw SMC used in all compression molding presses (a + b), in pounds;
- 1.d the calculated OC emissions, in pounds, using the following equations;

OC emissions (preheated) = (lbs/month, from section 1.b) x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = (lbs/month, from section 1.a) x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

*Emission factors were supplied by permittee and were based on laboratory testing.

- 1.e the rolling, 12-month summation of the monthly SMC usage rates, in pounds, for the non-preheated, preheated, and total (preheated and non-preheated) SMC usages, and the rolling, 12-month summation of the monthly OC emission rates, in tons.
2. In order to demonstrate compliance with the usage restrictions in condition A.II.2 and the allowable OC emission limitation of 37.10 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:
 - 2.a the company identification of each type of scrap SMC generated;
 - 2.b the total mass of scrap SMC generated, in pounds;
 - 2.c the styrene content of each type of scrap SMC generated, in %, by weight;
 - 2.d the weight, in pounds, of each type of scrap SMC generated;

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

- 2.e** the calculated average styrene content for all the scrap SMC generated, in weight % (summation of 2.c x 2.d, divided by the summation of 2.d for all SMC materials, and multiplied by 100%) ;
- 2.f** the total mass of OC emissions generated by all molding presses ($b \times e \times 0.40$ volatilization factor*), in pounds; and
- *Emission factor supplied by permittee and was based on laboratory testing.
- 2.g** the rolling, 12-month summation of the SMC scrap generation, in pounds, and the rolling, 12-month summation of the monthly OC emissions, in tons.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emissions limitation of 38.6 tons (for SMC compression molding from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 37.10 tons (for scrap generation from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC usage restrictions of 2,000,000 lbs of preheated SMC, 37,100,000 lbs of non-preheated SMC, and 37,100,000 lbs of all SMC, combined (preheated and non-preheated) [from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined]. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC scrap generation restriction of 37,100,000 lbs (from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
5. The permittee shall submit annual reports that specify the total OC emissions from SMC compression molding, the total OC emissions from scrap generation, the total SMC usage (preheated, non-preheated and combined) [in pounds], and the total scrap SMC generated (in pounds) for the previous calendar year. These reports shall be submitted by January 31 of each year, and shall cover the previous calendar year.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
1.26 lbs OC/hour and 4.20 tons OC/year (molding only)

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum hourly SMC usage rate (lbs/hr) by a worst-case emission factor of 0.0035 pound of OC per pound of SMC.*

*Emission factor supplied by permittee and was based on laboratory testing.

Compliance with the annual emission limitation may be determined as follows:

- i. multiply the maximum annual usage rate of preheated SMC (2,000,000 lbs/year) by a worst-case emission factor of 0.0035 lb OC/lb of SMC for preheated materials;
- ii. multiply the maximum annual usage rate of non-preheated SMC (700,000 lbs/year) by a worst-case emission factor of 0.002 lb OC/lb of SMC for non-preheated materials; and
- iii. sum i. and ii., and then divide by 2000.

- 1.b** Emission Limitation:
OC emissions for sheet molding compound (SMC) usage shall not exceed 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in section A.III.1. of this permit.

- 1.c** Emission Limitation:
OC emissions for scrap generation shall not exceed 37.10 tons OC per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.II.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>
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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: Press Area #2 (P010)

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #2	OAC rule 3745-31-05 (PTI 03-13396)	compression molding- 1.26 lbs organic compound (OC)/hour, 4.20 tons OC/year (See A.1.2.a and A.1.2.c.)
	OAC rule 3745-31-02(A) (PTI #03-13396)	combined limit of 38.60 tons OC/rolling, 12-month period (See A.1.2.b.)
		scrap generation- combined limit of 37.10 tons OC/rolling, 12-month period (See A.1.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-02(A)(2).
- 2.b The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions (see A.II.1) and are being established for the purposes of maintaining the facility's status as a PSD "minor".
- 2.c The 1.26 lbs OC/hr and 4.20 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.

II. Operational Restrictions

1. The maximum annual SMC usage for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed any of the following:
 - a. 2,000,000 lbs of preheated SMC;*
 - b. 37,100,000 lbs of non-preheated SMC;* and
 - c. 37,100,000 lbs of all SMC combined (preheated and non-preheated).*

*The annual SMC usage restriction shall be based upon a rolling, 12-month summation of the monthly SMC input rates.

2. The maximum annual scrap generation for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed 37,100,000 lbs per rolling, 12-month period.
3. Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the usage restrictions in condition A.II.1. and the allowable OC emission limitation of 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

- 1.a the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;
- 1.b the total mass of raw SMC preheated before use in all compression molding presses, in pounds;
- 1.c the total mass of raw SMC used in all compression molding presses (a + b), in pounds;
- 1.d the calculated OC emissions, in pounds, using the following equations;

OC emissions (preheated) = (lbs/month, from section 1.b) x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = (lbs/month, from section 1.a) x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

*Emission factors were supplied by permittee and were based on laboratory testing.

- 1.e the rolling, 12-month summation of the monthly SMC usage rates, in pounds, for the non-preheated, preheated, and total (preheated and non-preheated) SMC usages, and the rolling, 12-month summation of the monthly OC emission rates, in tons.
2. In order to demonstrate compliance with the usage restrictions in condition A.II.2 and the allowable OC emission limitation of 37.10 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:
 - 2.a the company identification of each type of scrap SMC generated;
 - 2.b the total mass of scrap SMC generated, in pounds;
 - 2.c the styrene content of each type of scrap SMC generated, in %, by weight;
 - 2.d the weight, in pounds, of each type of scrap SMC generated;

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

- 2.e** the calculated average styrene content for all the scrap SMC generated, in weight % (summation of 2.c x 2.d, divided by the summation of 2.d for all SMC materials, and multiplied by 100%) ;
- 2.f** the total mass of OC emissions generated by all molding presses ($b \times e \times 0.40$ volatilization factor*), in pounds; and
- *Emission factor supplied by permittee and was based on laboratory testing.
- 2.g** the rolling, 12-month summation of the SMC scrap generation, in pounds, and the rolling, 12-month summation of the monthly OC emissions, in tons.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emissions limitation of 38.6 tons (for SMC compression molding from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 37.10 tons (for scrap generation from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC usage restrictions of 2,000,000 lbs of preheated SMC, 37,100,000 lbs of non-preheated SMC, and 37,100,000 lbs of all SMC, combined (preheated and non-preheated) [from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined]. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC scrap generation restriction of 37,100,000 lbs (from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
5. The permittee shall submit annual reports that specify the total OC emissions from SMC compression molding, the total OC emissions from scrap generation, the total SMC usage (preheated, non-preheated and combined) [in pounds], and the total scrap SMC generated (in pounds) for the previous calendar year. These reports shall be submitted by January 31 of each year, and shall cover the previous calendar year.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
1.26 lbs OC/hour and 4.20 tons OC/year (molding only)

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum hourly SMC usage rate (lbs/hr) by a worst-case emission factor of 0.0035 pound of OC per pound of SMC.*

*Emission factor supplied by permittee and was based on laboratory testing.

Compliance with the annual emission limitation may be determined as follows:

- i. multiply the maximum annual usage rate of preheated SMC (2,000,000 lbs/year) by a worst-case emission factor of 0.0035 lb OC/lb of SMC for preheated materials;
- ii. multiply the maximum annual usage rate of non-preheated SMC (700,000 lbs/year) by a worst-case emission factor of 0.002 lb OC/lb of SMC for non-preheated materials; and
- iii. sum i. and ii., and then divide by 2000.

- 1.b** Emission Limitation:
OC emissions for sheet molding compound (SMC) usage shall not exceed 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in section A.III.1. of this permit.

- 1.c** Emission Limitation:
OC emissions for scrap generation shall not exceed 37.10 tons OC per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.II.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>
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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: Press Area #5 (P013)

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #5	OAC rule 3745-31-05 (PTI 03-13396)	compression molding- 1.05 lbs organic compound (OC)/hour, 3.75 tons OC/year (See A.1.2.a and A.1.2.c.)
	OAC rule 3745-31-02(A) (PTI #03-13396)	combined limit of 38.60 tons OC/rolling, 12-month period (See A.1.2.b.)
		scrap generation- combined limit of 37.10 tons OC/rolling, 12-month period (See A.1.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-02(A)(2).
- 2.b The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions (see A.II.1) and are being established for the purposes of maintaining the facility's status as a PSD "minor".
- 2.c The 1.05 lbs OC/hr and 3.75 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.

II. Operational Restrictions

1. The maximum annual SMC usage for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed any of the following:
 - a. 2,000,000 lbs of preheated SMC;*
 - b. 37,100,000 lbs of non-preheated SMC;* and
 - c. 37,100,000 lbs of all SMC combined (preheated and non-preheated).*

*The annual SMC usage restriction shall be based upon a rolling, 12-month summation of the monthly SMC input rates.

2. The maximum annual scrap generation for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed 37,100,000 lbs per rolling, 12-month period.
3. Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the usage restrictions in condition A.II.1. and the allowable OC emission limitation of 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

- 1.a the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;
- 1.b the total mass of raw SMC preheated before use in all compression molding presses, in pounds;
- 1.c the total mass of raw SMC used in all compression molding presses (a + b), in pounds;
- 1.d the calculated OC emissions, in pounds, using the following equations;

OC emissions (preheated) = (lbs/month, from section 1.b) x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = (lbs/month, from section 1.a) x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

*Emission factors were supplied by permittee and were based on laboratory testing.

- 1.e the rolling, 12-month summation of the monthly SMC usage rates, in pounds, for the non-preheated, preheated, and total (preheated and non-preheated) SMC usages, and the rolling, 12-month summation of the monthly OC emission rates, in tons.
2. In order to demonstrate compliance with the usage restrictions in condition A.II.2 and the allowable OC emission limitation of 37.10 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:
 - 2.a the company identification of each type of scrap SMC generated;
 - 2.b the total mass of scrap SMC generated, in pounds;
 - 2.c the styrene content of each type of scrap SMC generated, in %, by weight;
 - 2.d the weight, in pounds, of each type of scrap SMC generated;

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

- 2.e** the calculated average styrene content for all the scrap SMC generated, in weight % (summation of 2.c x 2.d, divided by the summation of 2.d for all SMC materials, and multiplied by 100%) ;
- 2.f** the total mass of OC emissions generated by all molding presses ($b \times e \times 0.40$ volatilization factor*), in pounds; and
- *Emission factor supplied by permittee and was based on laboratory testing.
- 2.g** the rolling, 12-month summation of the SMC scrap generation, in pounds, and the rolling, 12-month summation of the monthly OC emissions, in tons.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emissions limitation of 38.6 tons (for SMC compression molding from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 37.10 tons (for scrap generation from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC usage restrictions of 2,000,000 lbs of preheated SMC, 37,100,000 lbs of non-preheated SMC, and 37,100,000 lbs of all SMC, combined (preheated and non-preheated) [from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined]. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC scrap generation restriction of 37,100,000 lbs (from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
5. The permittee shall submit annual reports that specify the total OC emissions from SMC compression molding, the total OC emissions from scrap generation, the total SMC usage (preheated, non-preheated and combined) [in pounds], and the total scrap SMC generated (in pounds) for the previous calendar year. These reports shall be submitted by January 31 of each year, and shall cover the previous calendar year.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
1.05 lbs OC/hour and 3.75 tons OC/year (molding only)

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum hourly SMC usage rate (lbs/hr) by a worst-case emission factor of 0.0035 pound of OC per pound of SMC.*

*Emission factor supplied by permittee and was based on laboratory testing.

Compliance with the annual emission limitation may be determined as follows:

- i. multiply the maximum annual usage rate of preheated SMC (2,000,000 lbs/year) by a worst-case emission factor of 0.0035 lb OC/lb of SMC for preheated materials;
- ii. multiply the maximum annual usage rate of non-preheated SMC (250,000 lbs/year) by a worst-case emission factor of 0.002 lb OC/lb of SMC for non-preheated materials; and
- iii. sum i. and ii., and then divide by 2000.

- 1.b** Emission Limitation:
OC emissions for sheet molding compound (SMC) usage shall not exceed 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in section A.III.1. of this permit.

- 1.c** Emission Limitation:
OC emissions for scrap generation shall not exceed 37.10 tons OC per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.II.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>
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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: Press Area #6 (P014)

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #6	OAC rule 3745-31-05 (PTI 03-13396)	compression molding- 0.98 lb organic compound (OC)/hour, 3.60 tons OC/year (See A.I.2.a and A.I.2.c.)
	OAC rule 3745-31-02(A) (PTI #03-13396)	combined limit of 38.60 tons OC/rolling, 12-month period (See A.I.2.b.)
		scrap generation- combined limit of 37.10 tons OC/rolling, 12-month period (See A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-02(A)(2).
- 2.b The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions (see A.II.1) and are being established for the purposes of maintaining the facility's status as a PSD "minor".
- 2.c The 0.98 lb OC/hr and 3.60 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.

II. Operational Restrictions

1. The maximum annual SMC usage for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed any of the following:
 - a. 2,000,000 lbs of preheated SMC;*
 - b. 37,100,000 lbs of non-preheated SMC;* and
 - c. 37,100,000 lbs of all SMC combined (preheated and non-preheated).*

*The annual SMC usage restriction shall be based upon a rolling, 12-month summation of the monthly SMC input rates.

2. The maximum annual scrap generation for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed 37,100,000 lbs per rolling, 12-month period.
3. Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the usage restrictions in condition A.II.1. and the allowable OC emission limitation of 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

- 1.a the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;
- 1.b the total mass of raw SMC preheated before use in all compression molding presses, in pounds;
- 1.c the total mass of raw SMC used in all compression molding presses (a + b), in pounds;
- 1.d the calculated OC emissions, in pounds, using the following equations;

OC emissions (preheated) = (lbs/month, from section 1.b) x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = (lbs/month, from section 1.a) x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

*Emission factors were supplied by permittee and were based on laboratory testing.

- 1.e the rolling, 12-month summation of the monthly SMC usage rates, in pounds, for the non-preheated, preheated, and total (preheated and non-preheated) SMC usages, and the rolling, 12-month summation of the monthly OC emission rates, in tons.
2. In order to demonstrate compliance with the usage restrictions in condition A.II.2 and the allowable OC emission limitation of 37.10 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:
 - 2.a the company identification of each type of scrap SMC generated;
 - 2.b the total mass of scrap SMC generated, in pounds;
 - 2.c the styrene content of each type of scrap SMC generated, in %, by weight;
 - 2.d the weight, in pounds, of each type of scrap SMC generated;

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

- 2.e the calculated average styrene content for all the scrap SMC generated, in weight % (summation of 2.c x 2.d, divided by the summation of 2.d for all SMC materials, and multiplied by 100%) ;
- 2.f the total mass of OC emissions generated by all molding presses (b x e x 0.40 volatilization factor*), in pounds; and

*Emission factor supplied by permittee and was based on laboratory testing.
- 2.g the rolling, 12-month summation of the SMC scrap generation, in pounds, and the rolling, 12-month summation of the monthly OC emissions, in tons.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emissions limitation of 38.6 tons (for SMC compression molding from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 37.10 tons (for scrap generation from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC usage restrictions of 2,000,000 lbs of preheated SMC, 37,100,000 lbs of non-preheated SMC, and 37,100,000 lbs of all SMC, combined (preheated and non-preheated) [from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined]. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC scrap generation restriction of 37,100,000 lbs (from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 5. The permittee shall submit annual reports that specify the total OC emissions from SMC compression molding, the total OC emissions from scrap generation, the total SMC usage (preheated, non-preheated and combined) [in pounds], and the total scrap SMC generated (in pounds) for the previous calendar year. These reports shall be submitted by January 31 of each year, and shall cover the previous calendar year.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
0.98 lb OC/hour and 3.60 tons OC/year (molding only)

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum hourly SMC usage rate (lbs/hr) by a worst-case emission factor of 0.0035 pound of OC per pound of SMC.*

*Emission factor supplied by permittee and was based on laboratory testing.

Compliance with the annual emission limitation may be determined as follows:

- i. multiply the maximum annual usage rate of preheated SMC (2,000,000 lbs/year) by a worst-case emission factor of 0.0035 lb OC/lb of SMC for preheated materials;
- ii. multiply the maximum annual usage rate of non-preheated SMC (100,000 lbs/year) by a worst-case emission factor of 0.002 lb OC/lb of SMC for non-preheated materials; and
- iii. sum i. and ii., and then divide by 2000.

- 1.b** Emission Limitation:
OC emissions for sheet molding compound (SMC) usage shall not exceed 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in section A.III.1. of this permit.

- 1.c** Emission Limitation:
OC emissions for scrap generation shall not exceed 37.10 tons OC per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.II.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>
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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: Press Area #8 (P016)

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #8	OAC rule 3745-31-05 (PTI 03-13396)	compression molding- 1.96 lbs organic compound (OC)/hour, 5.70 tons OC/year (See A.1.2.a and A.1.2.c.)
	OAC rule 3745-31-02(A) (PTI #03-13396)	combined limit of 38.60 tons OC/rolling, 12-month period (See A.1.2.b.)
		scrap generation- combined limit of 37.10 tons OC/rolling, 12-month period (See A.1.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-02(A)(2).
- 2.b The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions (see A.II.1) and are being established for the purposes of maintaining the facility's status as a PSD "minor".
- 2.c The 1.96 lbs OC/hr and 5.70 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.

II. Operational Restrictions

1. The maximum annual SMC usage for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed any of the following:
 - a. 2,000,000 lbs of preheated SMC;*
 - b. 37,100,000 lbs of non-preheated SMC;* and
 - c. 37,100,000 lbs of all SMC combined (preheated and non-preheated).*

*The annual SMC usage restriction shall be based upon a rolling, 12-month summation of the monthly SMC input rates.

2. The maximum annual scrap generation for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed 37,100,000 lbs per rolling, 12-month period.
3. Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the usage restrictions in condition A.II.1. and the allowable OC emission limitation of 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

- 1.a the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;
- 1.b the total mass of raw SMC preheated before use in all compression molding presses, in pounds;
- 1.c the total mass of raw SMC used in all compression molding presses (a + b), in pounds;
- 1.d the calculated OC emissions, in pounds, using the following equations;

OC emissions (preheated) = (lbs/month, from section 1.b) x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = (lbs/month, from section 1.a) x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

*Emission factors were supplied by permittee and were based on laboratory testing.

- 1.e the rolling, 12-month summation of the monthly SMC usage rates, in pounds, for the non-preheated, preheated, and total (preheated and non-preheated) SMC usages, and the rolling, 12-month summation of the monthly OC emission rates, in tons.
2. In order to demonstrate compliance with the usage restrictions in condition A.II.2 and the allowable OC emission limitation of 37.10 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:
 - 2.a the company identification of each type of scrap SMC generated;
 - 2.b the total mass of scrap SMC generated, in pounds;
 - 2.c the styrene content of each type of scrap SMC generated, in %, by weight;
 - 2.d the weight, in pounds, of each type of scrap SMC generated;

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

- 2.e the calculated average styrene content for all the scrap SMC generated, in weight % (summation of 2.c x 2.d, divided by the summation of 2.d for all SMC materials, and multiplied by 100%) ;
- 2.f the total mass of OC emissions generated by all molding presses ($b \times e \times 0.40$ volatilization factor*), in pounds; and

*Emission factor supplied by permittee and was based on laboratory testing.
- 2.g the rolling, 12-month summation of the SMC scrap generation, in pounds, and the rolling, 12-month summation of the monthly OC emissions, in tons.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emissions limitation of 38.6 tons (for SMC compression molding from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 37.10 tons (for scrap generation from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC usage restrictions of 2,000,000 lbs of preheated SMC, 37,100,000 lbs of non-preheated SMC, and 37,100,000 lbs of all SMC, combined (preheated and non-preheated) [from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined]. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC scrap generation restriction of 37,100,000 lbs (from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 5. The permittee shall submit annual reports that specify the total OC emissions from SMC compression molding, the total OC emissions from scrap generation, the total SMC usage (preheated, non-preheated and combined) [in pounds], and the total scrap SMC generated (in pounds) for the previous calendar year. These reports shall be submitted by January 31 of each year, and shall cover the previous calendar year.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
1.96 lbs OC/hour and 5.70 tons OC/year (molding only)

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum hourly SMC usage rate (lbs/hr) by a worst-case emission factor of 0.0035 pound of OC per pound of SMC.*

*Emission factor supplied by permittee and was based on laboratory testing.

Compliance with the annual emission limitation may be determined as follows:

- i. multiply the maximum annual usage rate of preheated SMC (2,000,000 lbs/year) by a worst-case emission factor of 0.0035 lb OC/lb of SMC for preheated materials;
- ii. multiply the maximum annual usage rate of non-preheated SMC (2,200,000 lbs/year) by a worst-case emission factor of 0.002 lb OC/lb of SMC for non-preheated materials; and
- iii. sum i. and ii., and then divide by 2000.

- 1.b** Emission Limitation:
OC emissions for sheet molding compound (SMC) usage shall not exceed 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in section A.III.1. of this permit.

- 1.c** Emission Limitation:
OC emissions for scrap generation shall not exceed 37.10 tons OC per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.II.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>
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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: Press Area #9 (P017)

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #9	OAC rule 3745-31-05 (PTI 03-13396)	compression molding- 2.10 lbs organic compound (OC)/hour, 6.00 tons OC/year (See A.1.2.a and A.1.2.c.)
	OAC rule 3745-31-02(A) (PTI #03-13396)	combined limit of 38.60 tons OC/rolling, 12-month period (See A.1.2.b.)
		scrap generation- combined limit of 37.10 tons OC/rolling, 12-month period (See A.1.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-02(A)(2).
- 2.b The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions (see A.II.1) and are being established for the purposes of maintaining the facility's status as a PSD "minor".
- 2.c The 2.10 lbs OC/hr and 6.00 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.

II. Operational Restrictions

1. The maximum annual SMC usage for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed any of the following:
 - a. 2,000,000 lbs of preheated SMC;*
 - b. 37,100,000 lbs of non-preheated SMC;* and
 - c. 37,100,000 lbs of all SMC combined (preheated and non-preheated).*

*The annual SMC usage restriction shall be based upon a rolling, 12-month summation of the monthly SMC input rates.

2. The maximum annual scrap generation for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed 37,100,000 lbs per rolling, 12-month period.
3. Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the usage restrictions in condition A.II.1. and the allowable OC emission limitation of 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

- 1.a the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;
- 1.b the total mass of raw SMC preheated before use in all compression molding presses, in pounds;
- 1.c the total mass of raw SMC used in all compression molding presses (a + b), in pounds;
- 1.d the calculated OC emissions, in pounds, using the following equations;

OC emissions (preheated) = (lbs/month, from section 1.b) x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = (lbs/month, from section 1.a) x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

*Emission factors were supplied by permittee and were based on laboratory testing.

- 1.e the rolling, 12-month summation of the monthly SMC usage rates, in pounds, for the non-preheated, preheated, and total (preheated and non-preheated) SMC usages, and the rolling, 12-month summation of the monthly OC emission rates, in tons.
2. In order to demonstrate compliance with the usage restrictions in condition A.II.2 and the allowable OC emission limitation of 37.10 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:
 - 2.a the company identification of each type of scrap SMC generated;
 - 2.b the total mass of scrap SMC generated, in pounds;
 - 2.c the styrene content of each type of scrap SMC generated, in %, by weight;
 - 2.d the weight, in pounds, of each type of scrap SMC generated;

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

- 2.e the calculated average styrene content for all the scrap SMC generated, in weight % (summation of 2.c x 2.d, divided by the summation of 2.d for all SMC materials, and multiplied by 100%) ;
- 2.f the total mass of OC emissions generated by all molding presses (b x e x 0.40 volatilization factor*), in pounds; and

*Emission factor supplied by permittee and was based on laboratory testing.
- 2.g the rolling, 12-month summation of the SMC scrap generation, in pounds, and the rolling, 12-month summation of the monthly OC emissions, in tons.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emissions limitation of 38.6 tons (for SMC compression molding from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 37.10 tons (for scrap generation from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC usage restrictions of 2,000,000 lbs of preheated SMC, 37,100,000 lbs of non-preheated SMC, and 37,100,000 lbs of all SMC, combined (preheated and non-preheated) [from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined]. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC scrap generation restriction of 37,100,000 lbs (from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 5. The permittee shall submit annual reports that specify the total OC emissions from SMC compression molding, the total OC emissions from scrap generation, the total SMC usage (preheated, non-preheated and combined) [in pounds], and the total scrap SMC generated (in pounds) for the previous calendar year. These reports shall be submitted by January 31 of each year, and shall cover the previous calendar year.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
2.10 lbs OC/hour and 6.00 tons OC/year (molding only)

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum hourly SMC usage rate (lbs/hr) by a worst-case emission factor of 0.0035 pound of OC per pound of SMC.*

*Emission factor supplied by permittee and was based on laboratory testing.

Compliance with the annual emission limitation may be determined as follows:

- i. multiply the maximum annual usage rate of preheated SMC (2,000,000 lbs/year) by a worst-case emission factor of 0.0035 lb OC/lb of SMC for preheated materials;
- ii. multiply the maximum annual usage rate of non-preheated SMC (2,500,000 lbs/year) by a worst-case emission factor of 0.002 lb OC/lb of SMC for non-preheated materials; and
- iii. sum i. and ii., and then divide by 2000.

- 1.b** Emission Limitation:
OC emissions for sheet molding compound (SMC) usage shall not exceed 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in section A.III.1. of this permit.

- 1.c** Emission Limitation:
OC emissions for scrap generation shall not exceed 37.10 tons OC per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.II.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>
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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: Press Area #10 (P018)

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #10	OAC rule 3745-31-05 (PTI 03-13396)	compression molding- 2.73 lbs organic compound (OC)/hour, 7.35 tons OC/year (See A.1.2.a and A.1.2.c.)
	OAC rule 3745-31-02(A) (PTI #03-13396)	combined limit of 38.60 tons OC/rolling, 12-month period (See A.1.2.b.)
		scrap generation- combined limit of 37.10 tons OC/rolling, 12-month period (See A.1.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-02(A)(2).
- 2.b The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions (see A.II.1) and are being established for the purposes of maintaining the facility's status as a PSD "minor".
- 2.c The 2.73 lbs OC/hr and 7.35 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.

II. Operational Restrictions

1. The maximum annual SMC usage for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed any of the following:
 - a. 2,000,000 lbs of preheated SMC;*
 - b. 37,100,000 lbs of non-preheated SMC;* and
 - c. 37,100,000 lbs of all SMC combined (preheated and non-preheated).*

*The annual SMC usage restriction shall be based upon a rolling, 12-month summation of the monthly SMC input rates.

2. The maximum annual scrap generation for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed 37,100,000 lbs per rolling, 12-month period.
3. Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the usage restrictions in condition A.II.1. and the allowable OC emission limitation of 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

- 1.a the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;
- 1.b the total mass of raw SMC preheated before use in all compression molding presses, in pounds;
- 1.c the total mass of raw SMC used in all compression molding presses (a + b), in pounds;
- 1.d the calculated OC emissions, in pounds, using the following equations;

OC emissions (preheated) = (lbs/month, from section 1.b) x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = (lbs/month, from section 1.a) x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

*Emission factors were supplied by permittee and were based on laboratory testing.

- 1.e the rolling, 12-month summation of the monthly SMC usage rates, in pounds, for the non-preheated, preheated, and total (preheated and non-preheated) SMC usages, and the rolling, 12-month summation of the monthly OC emission rates, in tons.
2. In order to demonstrate compliance with the usage restrictions in condition A.II.2 and the allowable OC emission limitation of 37.10 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:
 - 2.a the company identification of each type of scrap SMC generated;
 - 2.b the total mass of scrap SMC generated, in pounds;
 - 2.c the styrene content of each type of scrap SMC generated, in %, by weight;
 - 2.d the weight, in pounds, of each type of scrap SMC generated;

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

- 2.e the calculated average styrene content for all the scrap SMC generated, in weight % (summation of 2.c x 2.d, divided by the summation of 2.d for all SMC materials, and multiplied by 100%) ;
- 2.f the total mass of OC emissions generated by all molding presses ($b \times e \times 0.40$ volatilization factor*), in pounds; and

*Emission factor supplied by permittee and was based on laboratory testing.
- 2.g the rolling, 12-month summation of the SMC scrap generation, in pounds, and the rolling, 12-month summation of the monthly OC emissions, in tons.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emissions limitation of 38.6 tons (for SMC compression molding from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 37.10 tons (for scrap generation from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC usage restrictions of 2,000,000 lbs of preheated SMC, 37,100,000 lbs of non-preheated SMC, and 37,100,000 lbs of all SMC, combined (preheated and non-preheated) [from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined]. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC scrap generation restriction of 37,100,000 lbs (from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 5. The permittee shall submit annual reports that specify the total OC emissions from SMC compression molding, the total OC emissions from scrap generation, the total SMC usage (preheated, non-preheated and combined) [in pounds], and the total scrap SMC generated (in pounds) for the previous calendar year. These reports shall be submitted by January 31 of each year, and shall cover the previous calendar year.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
2.73 lbs OC/hour and 7.35 tons OC/year (molding only)

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum hourly SMC usage rate (lbs/hr) by a worst-case emission factor of 0.0035 pound of OC per pound of SMC.*

*Emission factor supplied by permittee and was based on laboratory testing.

Compliance with the annual emission limitation may be determined as follows:

- i. multiply the maximum annual usage rate of preheated SMC (2,000,000 lbs/year) by a worst-case emission factor of 0.0035 lb OC/lb of SMC for preheated materials;
- ii. multiply the maximum annual usage rate of non-preheated SMC (3,850,000 lbs/year) by a worst-case emission factor of 0.002 lb OC/lb of SMC for non-preheated materials; and
- iii. sum i. and ii., and then divide by 2000.

- 1.b** Emission Limitation:
OC emissions for sheet molding compound (SMC) usage shall not exceed 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in section A.III.1. of this permit.

- 1.c** Emission Limitation:
OC emissions for scrap generation shall not exceed 37.10 tons OC per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.II.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>
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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: Press Area #11 (P019)

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #11	OAC rule 3745-31-05 (PTI 03-13396)	compression molding- 1.75 lbs organic compound (OC)/hour, 5.25 tons OC/year (See A.1.2.a and A.1.2.c.)
	OAC rule 3745-31-02(A) (PTI #03-13396)	combined limit of 38.60 tons OC/rolling, 12-month period (See A.1.2.b.)
		scrap generation- combined limit of 37.10 tons OC/rolling, 12-month period (See A.1.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-02(A)(2).
- 2.b The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions (see A.II.1) and are being established for the purposes of maintaining the facility's status as a PSD "minor".
- 2.c The 1.75 lbs OC/hr and 5.25 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.

II. Operational Restrictions

1. The maximum annual SMC usage for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed any of the following:
 - a. 2,000,000 lbs of preheated SMC;*
 - b. 37,100,000 lbs of non-preheated SMC;* and
 - c. 37,100,000 lbs of all SMC combined (preheated and non-preheated).*

*The annual SMC usage restriction shall be based upon a rolling, 12-month summation of the monthly SMC input rates.

2. The maximum annual scrap generation for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed 37,100,000 lbs per rolling, 12-month period.
3. Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the usage restrictions in condition A.II.1. and the allowable OC emission limitation of 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

- 1.a the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;
- 1.b the total mass of raw SMC preheated before use in all compression molding presses, in pounds;
- 1.c the total mass of raw SMC used in all compression molding presses (a + b), in pounds;
- 1.d the calculated OC emissions, in pounds, using the following equations;

OC emissions (preheated) = (lbs/month, from section 1.b) x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = (lbs/month, from section 1.a) x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

*Emission factors were supplied by permittee and were based on laboratory testing.

- 1.e the rolling, 12-month summation of the monthly SMC usage rates, in pounds, for the non-preheated, preheated, and total (preheated and non-preheated) SMC usages, and the rolling, 12-month summation of the monthly OC emission rates, in tons.
2. In order to demonstrate compliance with the usage restrictions in condition A.II.2 and the allowable OC emission limitation of 37.10 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:
 - 2.a the company identification of each type of scrap SMC generated;
 - 2.b the total mass of scrap SMC generated, in pounds;
 - 2.c the styrene content of each type of scrap SMC generated, in %, by weight;
 - 2.d the weight, in pounds, of each type of scrap SMC generated;

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

- 2.e the calculated average styrene content for all the scrap SMC generated, in weight % (summation of 2.c x 2.d, divided by the summation of 2.d for all SMC materials, and multiplied by 100%) ;
- 2.f the total mass of OC emissions generated by all molding presses (b x e x 0.40 volatilization factor*), in pounds; and

*Emission factor supplied by permittee and was based on laboratory testing.
- 2.g the rolling, 12-month summation of the SMC scrap generation, in pounds, and the rolling, 12-month summation of the monthly OC emissions, in tons.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emissions limitation of 38.6 tons (for SMC compression molding from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 37.10 tons (for scrap generation from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC usage restrictions of 2,000,000 lbs of preheated SMC, 37,100,000 lbs of non-preheated SMC, and 37,100,000 lbs of all SMC, combined (preheated and non-preheated) [from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined]. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC scrap generation restriction of 37,100,000 lbs (from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 5. The permittee shall submit annual reports that specify the total OC emissions from SMC compression molding, the total OC emissions from scrap generation, the total SMC usage (preheated, non-preheated and combined) [in pounds], and the total scrap SMC generated (in pounds) for the previous calendar year. These reports shall be submitted by January 31 of each year, and shall cover the previous calendar year.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
1.75 lbs OC/hour and 5.25 tons OC/year (molding only)

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum hourly SMC usage rate (lbs/hr) by a worst-case emission factor of 0.0035 pound of OC per pound of SMC.*

*Emission factor supplied by permittee and was based on laboratory testing.

Compliance with the annual emission limitation may be determined as follows:

- i. multiply the maximum annual usage rate of preheated SMC (2,000,000 lbs/year) by a worst-case emission factor of 0.0035 lb OC/lb of SMC for preheated materials;
- ii. multiply the maximum annual usage rate of non-preheated SMC (1,750,000 lbs/year) by a worst-case emission factor of 0.002 lb OC/lb of SMC for non-preheated materials; and
- iii. sum i. and ii., and then divide by 2000.

- 1.b** Emission Limitation:
OC emissions for sheet molding compound (SMC) usage shall not exceed 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in section A.III.1. of this permit.

- 1.c** Emission Limitation:
OC emissions for scrap generation shall not exceed 37.10 tons OC per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.II.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>
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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: Press Area #14 (P022)

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #14	OAC rule 3745-31-05 (PTI 03-13396)	compression molding- 0.25 lb organic compound (OC)/hour, 0.92 ton OC/year (See A.I.2.a and A.I.2.c.)
	OAC rule 3745-31-02(A) (PTI #03-13396)	combined limit of 38.60 tons OC/rolling, 12-month period (See A.I.2.b.)
		scrap generation- combined limit of 37.10 tons OC/rolling, 12-month period (See A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-02(A)(2).
- 2.b The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions (see A.II.1) and are being established for the purposes of maintaining the facility's status as a PSD "minor".
- 2.c The 0.25 lb OC/hr and 0.92 ton OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.

II. Operational Restrictions

1. The maximum annual SMC usage for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed any of the following:
 - a. 2,000,000 lbs of preheated SMC;*
 - b. 37,100,000 lbs of non-preheated SMC;* and
 - c. 37,100,000 lbs of all SMC combined (preheated and non-preheated).*

*The annual SMC usage restriction shall be based upon a rolling, 12-month summation of the monthly SMC input rates.

2. The maximum annual scrap generation for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed 37,100,000 lbs per rolling, 12-month period.
3. Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the usage restrictions in condition A.II.1. and the allowable OC emission limitation of 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

- 1.a the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;
- 1.b the total mass of raw SMC preheated before use in all compression molding presses, in pounds;
- 1.c the total mass of raw SMC used in all compression molding presses (a + b), in pounds;
- 1.d the calculated OC emissions, in pounds, using the following equations;

OC emissions (preheated) = (lbs/month, from section 1.b) x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = (lbs/month, from section 1.a) x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

*Emission factors were supplied by permittee and were based on laboratory testing.

- 1.e the rolling, 12-month summation of the monthly SMC usage rates, in pounds, for the non-preheated, preheated, and total (preheated and non-preheated) SMC usages, and the rolling, 12-month summation of the monthly OC emission rates, in tons.
2. In order to demonstrate compliance with the usage restrictions in condition A.II.2 and the allowable OC emission limitation of 37.10 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:
 - 2.a the company identification of each type of scrap SMC generated;
 - 2.b the total mass of scrap SMC generated, in pounds;
 - 2.c the styrene content of each type of scrap SMC generated, in %, by weight;
 - 2.d the weight, in pounds, of each type of scrap SMC generated;

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

- 2.e** the calculated average styrene content for all the scrap SMC generated, in weight % (summation of 2.c x 2.d, divided by the summation of 2.d for all SMC materials, and multiplied by 100%) ;
- 2.f** the total mass of OC emissions generated by all molding presses ($b \times e \times 0.40$ volatilization factor*), in pounds; and
- *Emission factor supplied by permittee and was based on laboratory testing.
- 2.g** the rolling, 12-month summation of the SMC scrap generation, in pounds, and the rolling, 12-month summation of the monthly OC emissions, in tons.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emissions limitation of 38.6 tons (for SMC compression molding from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 37.10 tons (for scrap generation from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC usage restrictions of 2,000,000 lbs of preheated SMC, 37,100,000 lbs of non-preheated SMC, and 37,100,000 lbs of all SMC, combined (preheated and non-preheated) [from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined]. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC scrap generation restriction of 37,100,000 lbs (from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
5. The permittee shall submit annual reports that specify the total OC emissions from SMC compression molding, the total OC emissions from scrap generation, the total SMC usage (preheated, non-preheated and combined) [in pounds], and the total scrap SMC generated (in pounds) for the previous calendar year. These reports shall be submitted by January 31 of each year, and shall cover the previous calendar year.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
0.25 lb OC/hour and 0.92 ton OC/year (molding only)

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum hourly SMC usage rate (lbs/hr) by a worst-case emission factor of 0.0035 pound of OC per pound of SMC.*

*Emission factor supplied by permittee and was based on laboratory testing.

Compliance with the annual emission limitation may be determined as follows:

- i. multiply the maximum annual usage rate of non-preheated SMC (525,000 lbs/year) by a worst-case emission factor of 0.0035 lb OC/lb of SMC for preheated materials; and
- ii. divide 1.a.i by 2000.

- 1.b** Emission Limitation:
OC emissions for sheet molding compound (SMC) usage shall not exceed 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in section A.III.1. of this permit.

- 1.c** Emission Limitation:
OC emissions for scrap generation shall not exceed 37.10 tons OC per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.II.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>
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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: Press Area #15 (P023)

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #15	OAC rule 3745-31-05 (PTI 03-13396)	compression molding- 0.53 lb organic compound (OC)/hour, 1.97 tons OC/year (See A.I.2.a and A.I.2.c.)
	OAC rule 3745-31-02(A) (PTI #03-13396)	combined limit of 38.60 tons OC/rolling, 12-month period (See A.I.2.b.)
		scrap generation- combined limit of 37.10 tons OC/rolling, 12-month period (See A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-02(A)(2).
- 2.b The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions (see A.II.1) and are being established for the purposes of maintaining the facility's status as a PSD "minor".
- 2.c The 0.53 lb OC/hr and 1.97 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.

II. Operational Restrictions

1. The maximum annual SMC usage for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed any of the following:
 - a. 2,000,000 lbs of preheated SMC;*
 - b. 37,100,000 lbs of non-preheated SMC;* and
 - c. 37,100,000 lbs of all SMC combined (preheated and non-preheated).*

*The annual SMC usage restriction shall be based upon a rolling, 12-month summation of the monthly SMC input rates.

2. The maximum annual scrap generation for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed 37,100,000 lbs per rolling, 12-month period.
3. Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the usage restrictions in condition A.II.1. and the allowable OC emission limitation of 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

- 1.a the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;
- 1.b the total mass of raw SMC preheated before use in all compression molding presses, in pounds;
- 1.c the total mass of raw SMC used in all compression molding presses (a + b), in pounds;
- 1.d the calculated OC emissions, in pounds, using the following equations;

OC emissions (preheated) = (lbs/month, from section 1.b) x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = (lbs/month, from section 1.a) x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

*Emission factors were supplied by permittee and were based on laboratory testing.

- 1.e the rolling, 12-month summation of the monthly SMC usage rates, in pounds, for the non-preheated, preheated, and total (preheated and non-preheated) SMC usages, and the rolling, 12-month summation of the monthly OC emission rates, in tons.
2. In order to demonstrate compliance with the usage restrictions in condition A.II.2 and the allowable OC emission limitation of 37.10 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:
 - 2.a the company identification of each type of scrap SMC generated;
 - 2.b the total mass of scrap SMC generated, in pounds;
 - 2.c the styrene content of each type of scrap SMC generated, in %, by weight;
 - 2.d the weight, in pounds, of each type of scrap SMC generated;

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

- 2.e the calculated average styrene content for all the scrap SMC generated, in weight % (summation of 2.c x 2.d, divided by the summation of 2.d for all SMC materials, and multiplied by 100%) ;
- 2.f the total mass of OC emissions generated by all molding presses (b x e x 0.40 volatilization factor*), in pounds; and

*Emission factor supplied by permittee and was based on laboratory testing.
- 2.g the rolling, 12-month summation of the SMC scrap generation, in pounds, and the rolling, 12-month summation of the monthly OC emissions, in tons.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emissions limitation of 38.6 tons (for SMC compression molding from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 37.10 tons (for scrap generation from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC usage restrictions of 2,000,000 lbs of preheated SMC, 37,100,000 lbs of non-preheated SMC, and 37,100,000 lbs of all SMC, combined (preheated and non-preheated) [from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined]. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC scrap generation restriction of 37,100,000 lbs (from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 5. The permittee shall submit annual reports that specify the total OC emissions from SMC compression molding, the total OC emissions from scrap generation, the total SMC usage (preheated, non-preheated and combined) [in pounds], and the total scrap SMC generated (in pounds) for the previous calendar year. These reports shall be submitted by January 31 of each year, and shall cover the previous calendar year.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
0.53 lb OC/hour and 1.97 tons OC/year (molding only)

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum hourly SMC usage rate (lbs/hr) by a worst-case emission factor of 0.0035 pound of OC per pound of SMC.*

*Emission factor supplied by permittee and was based on laboratory testing.

Compliance with the annual emission limitation may be determined as follows:

- i. multiply the maximum annual usage rate of preheated SMC (1,125,000 lbs/year) by a worst-case emission factor of 0.0035 lb OC/lb of SMC for preheated materials; and
- ii. divide 1.a.i by 2000.

- 1.b** Emission Limitation:
OC emissions for sheet molding compound (SMC) usage shall not exceed 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in section A.III.1. of this permit.

- 1.c** Emission Limitation:
OC emissions for scrap generation shall not exceed 37.10 tons OC per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.II.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>
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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: Press Area #25 (P024)

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #25	OAC rule 3745-31-05 (PTI 03-13396)	compression molding- 0.77 lb organic compound (OC)/hour, 2.89 tons OC/year (See A.I.2.a and A.I.2.c.)
	OAC rule 3745-31-02(A) (PTI #03-13396)	combined limit of 38.60 tons OC/rolling, 12-month period (See A.I.2.b.)
		scrap generation- combined limit of 37.10 tons OC/rolling, 12-month period (See A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-02(A)(2).
- 2.b The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions (see A.II.1) and are being established for the purposes of maintaining the facility's status as a PSD "minor".
- 2.c The 0.77 lb OC/hr and 2.89 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.

II. Operational Restrictions

1. The maximum annual SMC usage for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed any of the following:
 - a. 2,000,000 lbs of preheated SMC;*
 - b. 37,100,000 lbs of non-preheated SMC;* and
 - c. 37,100,000 lbs of all SMC combined (preheated and non-preheated).*

*The annual SMC usage restriction shall be based upon a rolling, 12-month summation of the monthly SMC input rates.

2. The maximum annual scrap generation for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed 37,100,000 lbs per rolling, 12-month period.
3. Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the usage restrictions in condition A.II.1. and the allowable OC emission limitation of 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

- 1.a the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;
- 1.b the total mass of raw SMC preheated before use in all compression molding presses, in pounds;
- 1.c the total mass of raw SMC used in all compression molding presses (a + b), in pounds;
- 1.d the calculated OC emissions, in pounds, using the following equations;

OC emissions (preheated) = (lbs/month, from section 1.b) x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = (lbs/month, from section 1.a) x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

*Emission factors were supplied by permittee and were based on laboratory testing.

- 1.e the rolling, 12-month summation of the monthly SMC usage rates, in pounds, for the non-preheated, preheated, and total (preheated and non-preheated) SMC usages, and the rolling, 12-month summation of the monthly OC emission rates, in tons.
2. In order to demonstrate compliance with the usage restrictions in condition A.II.2 and the allowable OC emission limitation of 37.10 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:
 - 2.a the company identification of each type of scrap SMC generated;
 - 2.b the total mass of scrap SMC generated, in pounds;
 - 2.c the styrene content of each type of scrap SMC generated, in %, by weight;
 - 2.d the weight, in pounds, of each type of scrap SMC generated;

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

- 2.e the calculated average styrene content for all the scrap SMC generated, in weight % (summation of 2.c x 2.d, divided by the summation of 2.d for all SMC materials, and multiplied by 100%) ;
- 2.f the total mass of OC emissions generated by all molding presses (b x e x 0.40 volatilization factor*), in pounds; and

*Emission factor supplied by permittee and was based on laboratory testing.
- 2.g the rolling, 12-month summation of the SMC scrap generation, in pounds, and the rolling, 12-month summation of the monthly OC emissions, in tons.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emissions limitation of 38.6 tons (for SMC compression molding from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 37.10 tons (for scrap generation from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC usage restrictions of 2,000,000 lbs of preheated SMC, 37,100,000 lbs of non-preheated SMC, and 37,100,000 lbs of all SMC, combined (preheated and non-preheated) [from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined]. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC scrap generation restriction of 37,100,000 lbs (from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 5. The permittee shall submit annual reports that specify the total OC emissions from SMC compression molding, the total OC emissions from scrap generation, the total SMC usage (preheated, non-preheated and combined) [in pounds], and the total scrap SMC generated (in pounds) for the previous calendar year. These reports shall be submitted by January 31 of each year, and shall cover the previous calendar year.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
0.77 lb OC/hour and 2.89 tons OC/year (molding only)

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum hourly SMC usage rate (lbs/hr) by a worst-case emission factor of 0.0035 pound of OC per pound of SMC.*

*Emission factor supplied by permittee and was based on laboratory testing.

Compliance with the annual emission limitation may be determined as follows:

- i. multiply the maximum annual usage rate of preheated SMC (1,650,000 lbs/year) by a worst-case emission factor of 0.0035 lb OC/lb of SMC for preheated materials; and
- ii. divide 1.a.i by 2000.

- 1.b** Emission Limitation:
OC emissions for sheet molding compound (SMC) usage shall not exceed 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in section A.III.1. of this permit.

- 1.c** Emission Limitation:
OC emissions for scrap generation shall not exceed 37.10 tons OC per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.II.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>
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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: Press Area #19 (P026)

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #19	OAC rule 3745-31-05 (PTI 03-13396)	compression molding- 1.05 lbs organic compound (OC)/hour, 3.75 tons OC/year (See A.1.2.a and A.1.2.c.)
	OAC rule 3745-31-02(A) (PTI #03-13396)	combined limit of 38.60 tons OC/rolling, 12-month period (See A.1.2.b.)
		scrap generation- combined limit of 37.10 tons OC/rolling, 12-month period (See A.1.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-02(A)(2).
- 2.b The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions (see A.II.1) and are being established for the purposes of maintaining the facility's status as a PSD "minor".
- 2.c The 1.05 lbs OC/hr and 3.75 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.

II. Operational Restrictions

1. The maximum annual SMC usage for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed any of the following:
 - a. 2,000,000 lbs of preheated SMC;*
 - b. 37,100,000 lbs of non-preheated SMC;* and
 - c. 37,100,000 lbs of all SMC combined (preheated and non-preheated).*

*The annual SMC usage restriction shall be based upon a rolling, 12-month summation of the monthly SMC input rates.

2. The maximum annual scrap generation for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed 37,100,000 lbs per rolling, 12-month period.
3. Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the usage restrictions in condition A.II.1. and the allowable OC emission limitation of 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

- 1.a the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;
- 1.b the total mass of raw SMC preheated before use in all compression molding presses, in pounds;
- 1.c the total mass of raw SMC used in all compression molding presses (a + b), in pounds;
- 1.d the calculated OC emissions, in pounds, using the following equations;

OC emissions (preheated) = (lbs/month, from section 1.b) x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = (lbs/month, from section 1.a) x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

*Emission factors were supplied by permittee and were based on laboratory testing.

- 1.e the rolling, 12-month summation of the monthly SMC usage rates, in pounds, for the non-preheated, preheated, and total (preheated and non-preheated) SMC usages, and the rolling, 12-month summation of the monthly OC emission rates, in tons.
2. In order to demonstrate compliance with the usage restrictions in condition A.II.2 and the allowable OC emission limitation of 37.10 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:
 - 2.a the company identification of each type of scrap SMC generated;
 - 2.b the total mass of scrap SMC generated, in pounds;
 - 2.c the styrene content of each type of scrap SMC generated, in %, by weight;
 - 2.d the weight, in pounds, of each type of scrap SMC generated;

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

- 2.e the calculated average styrene content for all the scrap SMC generated, in weight % (summation of 2.c x 2.d, divided by the summation of 2.d for all SMC materials, and multiplied by 100%) ;
- 2.f the total mass of OC emissions generated by all molding presses ($b \times e \times 0.40$ volatilization factor*), in pounds; and

*Emission factor supplied by permittee and was based on laboratory testing.
- 2.g the rolling, 12-month summation of the SMC scrap generation, in pounds, and the rolling, 12-month summation of the monthly OC emissions, in tons.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emissions limitation of 38.6 tons (for SMC compression molding from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 37.10 tons (for scrap generation from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC usage restrictions of 2,000,000 lbs of preheated SMC, 37,100,000 lbs of non-preheated SMC, and 37,100,000 lbs of all SMC, combined (preheated and non-preheated) [from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined]. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC scrap generation restriction of 37,100,000 lbs (from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 5. The permittee shall submit annual reports that specify the total OC emissions from SMC compression molding, the total OC emissions from scrap generation, the total SMC usage (preheated, non-preheated and combined) [in pounds], and the total scrap SMC generated (in pounds) for the previous calendar year. These reports shall be submitted by January 31 of each year, and shall cover the previous calendar year.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
1.05 lbs OC/hour and 3.75 tons OC/year (molding only)

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum hourly SMC usage rate (lbs/hr) by a worst-case emission factor of 0.0035 pound of OC per pound of SMC.*

*Emission factor supplied by permittee and was based on laboratory testing.

Compliance with the annual emission limitation may be determined as follows:

- i. multiply the maximum annual usage rate of preheated SMC (2,000,000 lbs/year) by a worst-case emission factor of 0.0035 lb OC/lb of SMC for preheated materials;
- ii. multiply the maximum annual usage rate of non-preheated SMC (1,750,000 lbs/year) by a worst-case emission factor of 0.002 lb OC/lb of SMC for non-preheated materials; and
- iii. sum i. and ii., and then divide by 2000.

- 1.b** Emission Limitation:
OC emissions for sheet molding compound (SMC) usage shall not exceed 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in section A.III.1. of this permit.

- 1.c** Emission Limitation:
OC emissions for scrap generation shall not exceed 37.10 tons OC per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.II.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>
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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: Press Area #20 (P027)

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #20	OAC rule 3745-31-05 (PTI 03-13396)	compression molding- 1.05 lbs organic compound (OC)/hour, 3.75 tons OC/year (See A.1.2.a and A.1.2.c.)
	OAC rule 3745-31-02(A) (PTI #03-13396)	combined limit of 38.60 tons OC/rolling, 12-month period (See A.1.2.b.)
		scrap generation- combined limit of 37.10 tons OC/rolling, 12-month period (See A.1.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-02(A)(2).
- 2.b The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions (see A.II.1) and are being established for the purposes of maintaining the facility's status as a PSD "minor".
- 2.c The 1.05 lbs OC/hr and 3.75 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.

II. Operational Restrictions

1. The maximum annual SMC usage for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed any of the following:
 - a. 2,000,000 lbs of preheated SMC;*
 - b. 37,100,000 lbs of non-preheated SMC;* and
 - c. 37,100,000 lbs of all SMC combined (preheated and non-preheated).*

*The annual SMC usage restriction shall be based upon a rolling, 12-month summation of the monthly SMC input rates.

2. The maximum annual scrap generation for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed 37,100,000 lbs per rolling, 12-month period.
3. Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the usage restrictions in condition A.II.1. and the allowable OC emission limitation of 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

- 1.a the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;
- 1.b the total mass of raw SMC preheated before use in all compression molding presses, in pounds;
- 1.c the total mass of raw SMC used in all compression molding presses (a + b), in pounds;
- 1.d the calculated OC emissions, in pounds, using the following equations;

OC emissions (preheated) = (lbs/month, from section 1.b) x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = (lbs/month, from section 1.a) x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

*Emission factors were supplied by permittee and were based on laboratory testing.

- 1.e the rolling, 12-month summation of the monthly SMC usage rates, in pounds, for the non-preheated, preheated, and total (preheated and non-preheated) SMC usages, and the rolling, 12-month summation of the monthly OC emission rates, in tons.
2. In order to demonstrate compliance with the usage restrictions in condition A.II.2 and the allowable OC emission limitation of 37.10 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:
 - 2.a the company identification of each type of scrap SMC generated;
 - 2.b the total mass of scrap SMC generated, in pounds;
 - 2.c the styrene content of each type of scrap SMC generated, in %, by weight;
 - 2.d the weight, in pounds, of each type of scrap SMC generated;

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

- 2.e** the calculated average styrene content for all the scrap SMC generated, in weight % (summation of 2.c x 2.d, divided by the summation of 2.d for all SMC materials, and multiplied by 100%) ;
- 2.f** the total mass of OC emissions generated by all molding presses ($b \times e \times 0.40$ volatilization factor*), in pounds; and
- *Emission factor supplied by permittee and was based on laboratory testing.
- 2.g** the rolling, 12-month summation of the SMC scrap generation, in pounds, and the rolling, 12-month summation of the monthly OC emissions, in tons.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emissions limitation of 38.6 tons (for SMC compression molding from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 37.10 tons (for scrap generation from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC usage restrictions of 2,000,000 lbs of preheated SMC, 37,100,000 lbs of non-preheated SMC, and 37,100,000 lbs of all SMC, combined (preheated and non-preheated) [from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined]. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC scrap generation restriction of 37,100,000 lbs (from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
5. The permittee shall submit annual reports that specify the total OC emissions from SMC compression molding, the total OC emissions from scrap generation, the total SMC usage (preheated, non-preheated and combined) [in pounds], and the total scrap SMC generated (in pounds) for the previous calendar year. These reports shall be submitted by January 31 of each year, and shall cover the previous calendar year.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
1.05 lbs OC/hour and 3.75 tons OC/year (molding only)

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum hourly SMC usage rate (lbs/hr) by a worst-case emission factor of 0.0035 pound of OC per pound of SMC.*

*Emission factor supplied by permittee and was based on laboratory testing.

Compliance with the annual emission limitation may be determined as follows:

- i. multiply the maximum annual usage rate of preheated SMC (2,000,000 lbs/year) by a worst-case emission factor of 0.0035 lb OC/lb of SMC for preheated materials;
- ii. multiply the maximum annual usage rate of non-preheated SMC (1,750,000 lbs/year) by a worst-case emission factor of 0.002 lb OC/lb of SMC for non-preheated materials; and
- iii. sum i. and ii., and then divide by 2000.

- 1.b** Emission Limitation:
OC emissions for sheet molding compound (SMC) usage shall not exceed 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in section A.III.1. of this permit.

- 1.c** Emission Limitation:
OC emissions for scrap generation shall not exceed 37.10 tons OC per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.II.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>
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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: Press Area #21 (P028)

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #21	OAC rule 3745-31-05 (PTI 03-13396)	compression molding- 1.05 lbs organic compound (OC)/hour, 3.75 tons OC/year (See A.1.2.a and A.1.2.c.)
	OAC rule 3745-31-02(A) (PTI #03-13396)	combined limit of 38.60 tons OC/rolling, 12-month period (See A.1.2.b.)
		scrap generation- combined limit of 37.10 tons OC/rolling, 12-month period (See A.1.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-02(A)(2).
- 2.b The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions (see A.II.1) and are being established for the purposes of maintaining the facility's status as a PSD "minor".
- 2.c The 1.05 lbs OC/hr and 3.75 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.

II. Operational Restrictions

1. The maximum annual SMC usage for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed any of the following:
 - a. 2,000,000 lbs of preheated SMC;*
 - b. 37,100,000 lbs of non-preheated SMC;* and
 - c. 37,100,000 lbs of all SMC combined (preheated and non-preheated).*

*The annual SMC usage restriction shall be based upon a rolling, 12-month summation of the monthly SMC input rates.

2. The maximum annual scrap generation for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed 37,100,000 lbs per rolling, 12-month period.
3. Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the usage restrictions in condition A.II.1. and the allowable OC emission limitation of 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

- 1.a the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;
- 1.b the total mass of raw SMC preheated before use in all compression molding presses, in pounds;
- 1.c the total mass of raw SMC used in all compression molding presses (a + b), in pounds;
- 1.d the calculated OC emissions, in pounds, using the following equations;

OC emissions (preheated) = (lbs/month, from section 1.b) x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = (lbs/month, from section 1.a) x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

*Emission factors were supplied by permittee and were based on laboratory testing.

- 1.e the rolling, 12-month summation of the monthly SMC usage rates, in pounds, for the non-preheated, preheated, and total (preheated and non-preheated) SMC usages, and the rolling, 12-month summation of the monthly OC emission rates, in tons.
2. In order to demonstrate compliance with the usage restrictions in condition A.II.2 and the allowable OC emission limitation of 37.10 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:
 - 2.a the company identification of each type of scrap SMC generated;
 - 2.b the total mass of scrap SMC generated, in pounds;
 - 2.c the styrene content of each type of scrap SMC generated, in %, by weight;
 - 2.d the weight, in pounds, of each type of scrap SMC generated;

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

- 2.e the calculated average styrene content for all the scrap SMC generated, in weight % (summation of 2.c x 2.d, divided by the summation of 2.d for all SMC materials, and multiplied by 100%) ;
- 2.f the total mass of OC emissions generated by all molding presses (b x e x 0.40 volatilization factor*), in pounds; and

*Emission factor supplied by permittee and was based on laboratory testing.
- 2.g the rolling, 12-month summation of the SMC scrap generation, in pounds, and the rolling, 12-month summation of the monthly OC emissions, in tons.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emissions limitation of 38.6 tons (for SMC compression molding from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 37.10 tons (for scrap generation from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC usage restrictions of 2,000,000 lbs of preheated SMC, 37,100,000 lbs of non-preheated SMC, and 37,100,000 lbs of all SMC, combined (preheated and non-preheated) [from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined]. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC scrap generation restriction of 37,100,000 lbs (from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 5. The permittee shall submit annual reports that specify the total OC emissions from SMC compression molding, the total OC emissions from scrap generation, the total SMC usage (preheated, non-preheated and combined) [in pounds], and the total scrap SMC generated (in pounds) for the previous calendar year. These reports shall be submitted by January 31 of each year, and shall cover the previous calendar year.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
1.05 lbs OC/hour and 3.75 tons OC/year (molding only)

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum hourly SMC usage rate (lbs/hr) by a worst-case emission factor of 0.0035 pound of OC per pound of SMC.*

*Emission factor supplied by permittee and was based on laboratory testing.

Compliance with the annual emission limitation may be determined as follows:

- i. multiply the maximum annual usage rate of preheated SMC (2,000,000 lbs/year) by a worst-case emission factor of 0.0035 lb OC/lb of SMC for preheated materials;
- ii. multiply the maximum annual usage rate of non-preheated SMC (1,750,000 lbs/year) by a worst-case emission factor of 0.002 lb OC/lb of SMC for non-preheated materials; and
- iii. sum i. and ii., and then divide by 2000.

- 1.b** Emission Limitation:
OC emissions for sheet molding compound (SMC) usage shall not exceed 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in section A.III.1. of this permit.

- 1.c** Emission Limitation:
OC emissions for scrap generation shall not exceed 37.10 tons OC per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.II.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>
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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: Press Area #22 (P029)

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #22	OAC rule 3745-31-05 (PTI 03-13396)	compression molding- 1.05 lbs organic compound (OC)/hour, 3.75 tons OC/year (See A.1.2.a and A.1.2.c.)
	OAC rule 3745-31-02(A) (PTI #03-13396)	combined limit of 38.60 tons OC/rolling, 12-month period (See A.1.2.b.)
		scrap generation- combined limit of 37.10 tons OC/rolling, 12-month period (See A.1.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-02(A)(2).
- 2.b The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions (see A.II.1) and are being established for the purposes of maintaining the facility's status as a PSD "minor".
- 2.c The 1.05 lbs OC/hr and 3.75 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.

II. Operational Restrictions

1. The maximum annual SMC usage for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed any of the following:
 - a. 2,000,000 lbs of preheated SMC;*
 - b. 37,100,000 lbs of non-preheated SMC;* and
 - c. 37,100,000 lbs of all SMC combined (preheated and non-preheated).*

*The annual SMC usage restriction shall be based upon a rolling, 12-month summation of the monthly SMC input rates.

2. The maximum annual scrap generation for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed 37,100,000 lbs per rolling, 12-month period.
3. Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the usage restrictions in condition A.II.1. and the allowable OC emission limitation of 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

- 1.a the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;
- 1.b the total mass of raw SMC preheated before use in all compression molding presses, in pounds;
- 1.c the total mass of raw SMC used in all compression molding presses (a + b), in pounds;
- 1.d the calculated OC emissions, in pounds, using the following equations;

OC emissions (preheated) = (lbs/month, from section 1.b) x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = (lbs/month, from section 1.a) x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

*Emission factors were supplied by permittee and were based on laboratory testing.

- 1.e the rolling, 12-month summation of the monthly SMC usage rates, in pounds, for the non-preheated, preheated, and total (preheated and non-preheated) SMC usages, and the rolling, 12-month summation of the monthly OC emission rates, in tons.
2. In order to demonstrate compliance with the usage restrictions in condition A.II.2 and the allowable OC emission limitation of 37.10 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:
 - 2.a the company identification of each type of scrap SMC generated;
 - 2.b the total mass of scrap SMC generated, in pounds;
 - 2.c the styrene content of each type of scrap SMC generated, in %, by weight;
 - 2.d the weight, in pounds, of each type of scrap SMC generated;

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

- 2.e the calculated average styrene content for all the scrap SMC generated, in weight % (summation of 2.c x 2.d, divided by the summation of 2.d for all SMC materials, and multiplied by 100%) ;
- 2.f the total mass of OC emissions generated by all molding presses ($b \times e \times 0.40$ volatilization factor*), in pounds; and

*Emission factor supplied by permittee and was based on laboratory testing.
- 2.g the rolling, 12-month summation of the SMC scrap generation, in pounds, and the rolling, 12-month summation of the monthly OC emissions, in tons.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emissions limitation of 38.6 tons (for SMC compression molding from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 37.10 tons (for scrap generation from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC usage restrictions of 2,000,000 lbs of preheated SMC, 37,100,000 lbs of non-preheated SMC, and 37,100,000 lbs of all SMC, combined (preheated and non-preheated) [from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined]. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC scrap generation restriction of 37,100,000 lbs (from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 5. The permittee shall submit annual reports that specify the total OC emissions from SMC compression molding, the total OC emissions from scrap generation, the total SMC usage (preheated, non-preheated and combined) [in pounds], and the total scrap SMC generated (in pounds) for the previous calendar year. These reports shall be submitted by January 31 of each year, and shall cover the previous calendar year.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
1.05 lbs OC/hour and 3.75 tons OC/year (molding only)

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum hourly SMC usage rate (lbs/hr) by a worst-case emission factor of 0.0035 pound of OC per pound of SMC.*

*Emission factor supplied by permittee and was based on laboratory testing.

Compliance with the annual emission limitation may be determined as follows:

- i. multiply the maximum annual usage rate of preheated SMC (2,000,000 lbs/year) by a worst-case emission factor of 0.0035 lb OC/lb of SMC for preheated materials;
- ii. multiply the maximum annual usage rate of non-preheated SMC (1,750,000 lbs/year) by a worst-case emission factor of 0.002 lb OC/lb of SMC for non-preheated materials; and
- iii. sum i. and ii., and then divide by 2000.

- 1.b** Emission Limitation:
OC emissions for sheet molding compound (SMC) usage shall not exceed 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in section A.III.1. of this permit.

- 1.c** Emission Limitation:
OC emissions for scrap generation shall not exceed 37.10 tons OC per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.II.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>
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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: Press Area #23 (P030)

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #23	OAC rule 3745-31-05 (PTI 03-13396)	compression molding- 1.05 lbs organic compound (OC)/hour, 3.75 tons OC/year (See A.1.2.a and A.1.2.c.)
	OAC rule 3745-31-02(A) (PTI #03-13396)	combined limit of 38.60 tons OC/rolling, 12-month period (See A.1.2.b.)
		scrap generation- combined limit of 37.10 tons OC/rolling, 12-month period (See A.1.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-02(A)(2).
- 2.b The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions (see A.II.1) and are being established for the purposes of maintaining the facility's status as a PSD "minor".
- 2.c The 1.05 lbs OC/hr and 3.75 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.

II. Operational Restrictions

1. The maximum annual SMC usage for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed any of the following:
 - a. 2,000,000 lbs of preheated SMC;*
 - b. 37,100,000 lbs of non-preheated SMC;* and
 - c. 37,100,000 lbs of all SMC combined (preheated and non-preheated).*

*The annual SMC usage restriction shall be based upon a rolling, 12-month summation of the monthly SMC input rates.

2. The maximum annual scrap generation for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed 37,100,000 lbs per rolling, 12-month period.
3. Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the usage restrictions in condition A.II.1. and the allowable OC emission limitation of 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

- 1.a the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;
- 1.b the total mass of raw SMC preheated before use in all compression molding presses, in pounds;
- 1.c the total mass of raw SMC used in all compression molding presses (a + b), in pounds;
- 1.d the calculated OC emissions, in pounds, using the following equations;

OC emissions (preheated) = (lbs/month, from section 1.b) x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = (lbs/month, from section 1.a) x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

*Emission factors were supplied by permittee and were based on laboratory testing.

- 1.e the rolling, 12-month summation of the monthly SMC usage rates, in pounds, for the non-preheated, preheated, and total (preheated and non-preheated) SMC usages, and the rolling, 12-month summation of the monthly OC emission rates, in tons.
2. In order to demonstrate compliance with the usage restrictions in condition A.II.2 and the allowable OC emission limitation of 37.10 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:
 - 2.a the company identification of each type of scrap SMC generated;
 - 2.b the total mass of scrap SMC generated, in pounds;
 - 2.c the styrene content of each type of scrap SMC generated, in %, by weight;
 - 2.d the weight, in pounds, of each type of scrap SMC generated;

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

- 2.e the calculated average styrene content for all the scrap SMC generated, in weight % (summation of 2.c x 2.d, divided by the summation of 2.d for all SMC materials, and multiplied by 100%) ;
- 2.f the total mass of OC emissions generated by all molding presses ($b \times e \times 0.40$ volatilization factor*), in pounds; and

*Emission factor supplied by permittee and was based on laboratory testing.
- 2.g the rolling, 12-month summation of the SMC scrap generation, in pounds, and the rolling, 12-month summation of the monthly OC emissions, in tons.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emissions limitation of 38.6 tons (for SMC compression molding from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 37.10 tons (for scrap generation from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC usage restrictions of 2,000,000 lbs of preheated SMC, 37,100,000 lbs of non-preheated SMC, and 37,100,000 lbs of all SMC, combined (preheated and non-preheated) [from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined]. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC scrap generation restriction of 37,100,000 lbs (from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 5. The permittee shall submit annual reports that specify the total OC emissions from SMC compression molding, the total OC emissions from scrap generation, the total SMC usage (preheated, non-preheated and combined) [in pounds], and the total scrap SMC generated (in pounds) for the previous calendar year. These reports shall be submitted by January 31 of each year, and shall cover the previous calendar year.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
1.05 lbs OC/hour and 3.75 tons OC/year (molding only)

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum hourly SMC usage rate (lbs/hr) by a worst-case emission factor of 0.0035 pound of OC per pound of SMC.*

*Emission factor supplied by permittee and was based on laboratory testing.

Compliance with the annual emission limitation may be determined as follows:

- i. multiply the maximum annual usage rate of preheated SMC (2,000,000 lbs/year) by a worst-case emission factor of 0.0035 lb OC/lb of SMC for preheated materials;
- ii. multiply the maximum annual usage rate of non-preheated SMC (1,750,000 lbs/year) by a worst-case emission factor of 0.002 lb OC/lb of SMC for non-preheated materials; and
- iii. sum i. and ii., and then divide by 2000.

- 1.b** Emission Limitation:
OC emissions for sheet molding compound (SMC) usage shall not exceed 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in section A.III.1. of this permit.

- 1.c** Emission Limitation:
OC emissions for scrap generation shall not exceed 37.10 tons OC per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.II.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>
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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: Press Area #4 (P031)

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #4	OAC rule 3745-31-05 (PTI 03-13396)	compression molding- 2.59 lbs organic compound (OC)/hour, 7.05 tons OC/year (See A.1.2.a and A.1.2.c.)
	OAC rule 3745-31-02(A) (PTI #03-13396)	combined limit of 38.60 tons OC/rolling, 12-month period (See A.1.2.b.)
		scrap generation- combined limit of 37.10 tons OC/rolling, 12-month period (See A.1.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-02(A)(2).
- 2.b The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions (see A.II.1) and are being established for the purposes of maintaining the facility's status as a PSD "minor".
- 2.c The 2.59 lbs OC/hr and 7.05 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.

II. Operational Restrictions

1. The maximum annual SMC usage for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed any of the following:
 - a. 2,000,000 lbs of preheated SMC;*
 - b. 37,100,000 lbs of non-preheated SMC;* and
 - c. 37,100,000 lbs of all SMC combined (preheated and non-preheated).*

*The annual SMC usage restriction shall be based upon a rolling, 12-month summation of the monthly SMC input rates.

2. The maximum annual scrap generation for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed 37,100,000 lbs per rolling, 12-month period.
3. Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the usage restrictions in condition A.II.1. and the allowable OC emission limitation of 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

- 1.a the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;
- 1.b the total mass of raw SMC preheated before use in all compression molding presses, in pounds;
- 1.c the total mass of raw SMC used in all compression molding presses (a + b), in pounds;
- 1.d the calculated OC emissions, in pounds, using the following equations;

OC emissions (preheated) = (lbs/month, from section 1.b) x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = (lbs/month, from section 1.a) x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

*Emission factors were supplied by permittee and were based on laboratory testing.

- 1.e the rolling, 12-month summation of the monthly SMC usage rates, in pounds, for the non-preheated, preheated, and total (preheated and non-preheated) SMC usages, and the rolling, 12-month summation of the monthly OC emission rates, in tons.
2. In order to demonstrate compliance with the usage restrictions in condition A.II.2 and the allowable OC emission limitation of 37.10 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:
 - 2.a the company identification of each type of scrap SMC generated;
 - 2.b the total mass of scrap SMC generated, in pounds;
 - 2.c the styrene content of each type of scrap SMC generated, in %, by weight;
 - 2.d the weight, in pounds, of each type of scrap SMC generated;

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

- 2.e the calculated average styrene content for all the scrap SMC generated, in weight % (summation of 2.c x 2.d, divided by the summation of 2.d for all SMC materials, and multiplied by 100%) ;
- 2.f the total mass of OC emissions generated by all molding presses ($b \times e \times 0.40$ volatilization factor*), in pounds; and

*Emission factor supplied by permittee and was based on laboratory testing.
- 2.g the rolling, 12-month summation of the SMC scrap generation, in pounds, and the rolling, 12-month summation of the monthly OC emissions, in tons.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emissions limitation of 38.6 tons (for SMC compression molding from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 37.10 tons (for scrap generation from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC usage restrictions of 2,000,000 lbs of preheated SMC, 37,100,000 lbs of non-preheated SMC, and 37,100,000 lbs of all SMC, combined (preheated and non-preheated) [from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined]. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC scrap generation restriction of 37,100,000 lbs (from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 5. The permittee shall submit annual reports that specify the total OC emissions from SMC compression molding, the total OC emissions from scrap generation, the total SMC usage (preheated, non-preheated and combined) [in pounds], and the total scrap SMC generated (in pounds) for the previous calendar year. These reports shall be submitted by January 31 of each year, and shall cover the previous calendar year.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
2.59 lbs OC/hour and 7.05 tons OC/year (molding only)

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum hourly SMC usage rate (lbs/hr) by a worst-case emission factor of 0.0035 pound of OC per pound of SMC.*

*Emission factor supplied by permittee and was based on laboratory testing.

Compliance with the annual emission limitation may be determined as follows:

- i. multiply the maximum annual usage rate of preheated SMC (2,000,000 lbs/year) by a worst-case emission factor of 0.0035 lb OC/lb of SMC for preheated materials;
- ii. multiply the maximum annual usage rate of non-preheated SMC (3,550,000 lbs/year) by a worst-case emission factor of 0.002 lb OC/lb of SMC for non-preheated materials; and
- iii. sum i. and ii., and then divide by 2000.

- 1.b** Emission Limitation:
OC emissions for sheet molding compound (SMC) usage shall not exceed 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in section A.III.1. of this permit.

- 1.c** Emission Limitation:
OC emissions for scrap generation shall not exceed 37.10 tons OC per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.II.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>
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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: Press Area #24 (P032)

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #24	OAC rule 3745-31-05 (PTI 03-13396)	compression molding- 1.05 lbs organic compound (OC)/hour, 3.75 tons OC/year (See A.1.2.a and A.1.2.c.)
	OAC rule 3745-31-02(A) (PTI #03-13396)	combined limit of 38.60 tons OC/rolling, 12-month period (See A.1.2.b.)
		scrap generation- combined limit of 37.10 tons OC/rolling, 12-month period (See A.1.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-02(A)(2).
- 2.b The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions (see A.II.1) and are being established for the purposes of maintaining the facility's status as a PSD "minor".
- 2.c The 1.05 lbs OC/hr and 3.75 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.

II. Operational Restrictions

1. The maximum annual SMC usage for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed any of the following:
 - a. 2,000,000 lbs of preheated SMC;*
 - b. 37,100,000 lbs of non-preheated SMC;* and
 - c. 37,100,000 lbs of all SMC combined (preheated and non-preheated).*

*The annual SMC usage restriction shall be based upon a rolling, 12-month summation of the monthly SMC input rates.

2. The maximum annual scrap generation for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed 37,100,000 lbs per rolling, 12-month period.
3. Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the usage restrictions in condition A.II.1. and the allowable OC emission limitation of 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

- 1.a the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;
- 1.b the total mass of raw SMC preheated before use in all compression molding presses, in pounds;
- 1.c the total mass of raw SMC used in all compression molding presses (a + b), in pounds;
- 1.d the calculated OC emissions, in pounds, using the following equations;

OC emissions (preheated) = (lbs/month, from section 1.b) x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = (lbs/month, from section 1.a) x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

*Emission factors were supplied by permittee and were based on laboratory testing.

- 1.e the rolling, 12-month summation of the monthly SMC usage rates, in pounds, for the non-preheated, preheated, and total (preheated and non-preheated) SMC usages, and the rolling, 12-month summation of the monthly OC emission rates, in tons.
2. In order to demonstrate compliance with the usage restrictions in condition A.II.2 and the allowable OC emission limitation of 37.10 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:
 - 2.a the company identification of each type of scrap SMC generated;
 - 2.b the total mass of scrap SMC generated, in pounds;
 - 2.c the styrene content of each type of scrap SMC generated, in %, by weight;
 - 2.d the weight, in pounds, of each type of scrap SMC generated;

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

- 2.e the calculated average styrene content for all the scrap SMC generated, in weight % (summation of 2.c x 2.d, divided by the summation of 2.d for all SMC materials, and multiplied by 100%) ;
- 2.f the total mass of OC emissions generated by all molding presses (b x e x 0.40 volatilization factor*), in pounds; and

*Emission factor supplied by permittee and was based on laboratory testing.
- 2.g the rolling, 12-month summation of the SMC scrap generation, in pounds, and the rolling, 12-month summation of the monthly OC emissions, in tons.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emissions limitation of 38.6 tons (for SMC compression molding from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 37.10 tons (for scrap generation from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC usage restrictions of 2,000,000 lbs of preheated SMC, 37,100,000 lbs of non-preheated SMC, and 37,100,000 lbs of all SMC, combined (preheated and non-preheated) [from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined]. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC scrap generation restriction of 37,100,000 lbs (from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 5. The permittee shall submit annual reports that specify the total OC emissions from SMC compression molding, the total OC emissions from scrap generation, the total SMC usage (preheated, non-preheated and combined) [in pounds], and the total scrap SMC generated (in pounds) for the previous calendar year. These reports shall be submitted by January 31 of each year, and shall cover the previous calendar year.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
1.05 lbs OC/hour and 3.75 tons OC/year (molding only)

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum hourly SMC usage rate (lbs/hr) by a worst-case emission factor of 0.0035 pound of OC per pound of SMC.*

*Emission factor supplied by permittee and was based on laboratory testing.

Compliance with the annual emission limitation may be determined as follows:

- i. multiply the maximum annual usage rate of preheated SMC (2,000,000 lbs/year) by a worst-case emission factor of 0.0035 lb OC/lb of SMC for preheated materials;
- ii. multiply the maximum annual usage rate of non-preheated SMC (1,750,000 lbs/year) by a worst-case emission factor of 0.002 lb OC/lb of SMC for non-preheated materials; and
- iii. sum i. and ii., and then divide by 2000.

- 1.b** Emission Limitation:
OC emissions for sheet molding compound (SMC) usage shall not exceed 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in section A.III.1. of this permit.

- 1.c** Emission Limitation:
OC emissions for scrap generation shall not exceed 37.10 tons OC per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.II.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>
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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: Press Area #12A (P033)
Activity Description: Compression molding of sheet molding compound (SMC)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
compression sheet molding press #12A	OAC rule 3745-31-05 (PTI 03-13396)	compression molding- 2.04 lbs organic compound (OC)/hour, 5.87 tons OC/year (See A.1.2.a and A.1.2.c.)
	OAC rule 3745-31-02(A) (PTI #03-13396)	combined limit of 38.60 tons OC/rolling, 12-month period (See A.1.2.b.)
		scrap generation- combined limit of 37.10 tons OC/rolling, 12-month period (See A.1.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-02(A)(2).
- 2.b The permittee has requested federally enforceable combined emission limitations for compression molding and scrap generation from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033. The federally enforceable emission limitations are based on sheet molding compound (SMC) usage restrictions (see A.II.1) and are being established for the purposes of maintaining the facility's status as a PSD "minor".
- 2.c The 2.04 lbs OC/hr and 5.87 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.
- 2.d This emissions unit is not subject to the requirements specified in OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters the SMC press as a separate raw material.

II. Operational Restrictions

1. The maximum annual SMC usage for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed any of the following:
 - a. 2,000,000 lbs of preheated SMC;*
 - b. 37,100,000 lbs of non-preheated SMC;* and
 - c. 37,100,000 lbs of all SMC combined (preheated and non-preheated).*

*The annual SMC usage restriction shall be based upon a rolling, 12-month summation of the monthly SMC input rates.

2. The maximum annual scrap generation for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined, shall not exceed 37,100,000 lbs per rolling, 12-month period.
3. Raw scrap SMC shall be collected, at a minimum, every eight hours (i.e., at the end of each shift), weighed and placed in a closed container to minimize volatilization of additional styrene.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the usage restrictions in condition A.II.1. and the allowable OC emission limitation of 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:

- 1.a the total mass of raw SMC used in all compression molding presses, non-preheated, in pounds;
- 1.b the total mass of raw SMC preheated before use in all compression molding presses, in pounds;
- 1.c the total mass of raw SMC used in all compression molding presses (a + b), in pounds;
- 1.d the calculated OC emissions, in pounds, using the following equations;

OC emissions (preheated) = (lbs/month, from section 1.b) x (0.0035 lb OC/lb SMC)*

OC emissions (non-preheated) = (lbs/month, from section 1.a) x (0.002 lb OC/lb SMC)*

total OC emissions (tons/month) = [OC emissions (preheated) + OC emissions (non-preheated)] / 2000

*Emission factors were supplied by permittee and were based on laboratory testing.

- 1.e the rolling, 12-month summation of the monthly SMC usage rates, in pounds, for the non-preheated, preheated, and total (preheated and non-preheated) SMC usages, and the rolling, 12-month summation of the monthly OC emission rates, in tons.
2. In order to demonstrate compliance with the usage restrictions in condition A.II.2 and the allowable OC emission limitation of 37.10 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined), the permittee shall collect and record the following information for each month for all the emissions units, combined:
 - 2.a the company identification of each type of scrap SMC generated;
 - 2.b the total mass of scrap SMC generated, in pounds;
 - 2.c the styrene content of each type of scrap SMC generated, in %, by weight;
 - 2.d the weight, in pounds, of each type of scrap SMC generated;

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

- 2.e the calculated average styrene content for all the scrap SMC generated, in weight % (summation of 2.c x 2.d, divided by the summation of 2.d for all SMC materials, and multiplied by 100%) ;
- 2.f the total mass of OC emissions generated by all molding presses (b x e x 0.40 volatilization factor*), in pounds; and

*Emission factor supplied by permittee and was based on laboratory testing.
- 2.g the rolling, 12-month summation of the SMC scrap generation, in pounds, and the rolling, 12-month summation of the monthly OC emissions, in tons.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emissions limitation of 38.6 tons (for SMC compression molding from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 37.10 tons (for scrap generation from P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC usage restrictions of 2,000,000 lbs of preheated SMC, 37,100,000 lbs of non-preheated SMC, and 37,100,000 lbs of all SMC, combined (preheated and non-preheated) [from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined]. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined maximum annual SMC scrap generation restriction of 37,100,000 lbs (from emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 5. The permittee shall submit annual reports that specify the total OC emissions from SMC compression molding, the total OC emissions from scrap generation, the total SMC usage (preheated, non-preheated and combined) [in pounds], and the total scrap SMC generated (in pounds) for the previous calendar year. These reports shall be submitted by January 31 of each year, and shall cover the previous calendar year.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
2.04 lbs OC/hour and 5.87 tons OC/year (molding only)

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum hourly SMC usage rate (lbs/hr) by a worst-case emission factor of 0.0035 pound of OC per pound of SMC.*

*Emission factor supplied by permittee and was based on laboratory testing.

Compliance with the annual emission limitation may be determined as follows:

- i. multiply the maximum annual usage rate of preheated SMC (2,000,000 lbs/year) by a worst-case emission factor of 0.0035 lb OC/lb of SMC for preheated materials;
- ii. multiply the maximum annual usage rate of non-preheated SMC (2,372,000 lbs/year) by a worst-case emission factor of 0.002 lb OC/lb of SMC for non-preheated materials; and
- iii. sum i. and ii., and then divide by 2000.

- 1.b** Emission Limitation:
OC emissions for sheet molding compound (SMC) usage shall not exceed 38.60 tons per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in section A.III.1. of this permit.

- 1.c** Emission Limitation:
OC emissions for scrap generation shall not exceed 37.10 tons OC per rolling, 12-month period (for emissions units P009, P010, P013, P014, P016, P017, P018, P019, P022, P023, P024, P026, P027, P028, P029, P030, P031, P032 and P033, combined).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.II.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>
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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: Secondary Finishing Operations (P901)

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
secondary finishing operation of fiberglass reinforced parts, with three baghouses	OAC rule 3745-31-05(A) (PTI 03-13293)	0.77 lb particulate emissions (PE)/hour, 3.37 tons PE/year, from stack emissions
		2.15 tons PE/year, from fugitive emissions
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-11(B)(1)	See A.I.2.a.
	OAC rule 3745-17-07(A)	Visible fugitive PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-08(B)	See A.I.2.b.
	OAC rule 3745-17-07(B)	See A.I.2.c.

2. Additional Terms and Conditions

- 2.a The emission limitation/control requirements specified by this rule is less stringent than the emission limitation/control requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The Budd Company, Plastics Division facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- 2.c This emissions unit is exempt from visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.d Best available technology (BAT) for this emission unit has been determined to be use of baghouses with a maximum outlet concentration of 0.004 gr/dscf and the use of best available control measures for fugitive dust control (see A.I.2.e).

2. Additional Terms and Conditions (continued)

- 2.e The permittee shall employ best available control measures on all the PE from secondary finishing operations not captured and controlled by a baghouse system, for the purpose of ensuring compliance with the above mentioned applicable requirements. Secondary finishing operations shall be contained within facility building (enclosure control) to ensure compliance.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouses serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

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

3. Notwithstanding the frequency of the reporting requirements specified in Section IV, the permittee may reduce the frequency of visual observations of visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) associated with this emissions unit from weekly to monthly readings if for 1 full quarter the facility's visual observations indicate no abnormal visible fugitive particulate emissions from the egress points associated with this emissions unit.

The permittee shall revert to weekly readings if any abnormal visible fugitive particulate emissions from the egress points associated with this emissions unit are observed.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from all the baghouses serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitation in Section A.I. of these terms and conditions shall be determined in accordance with the following method:
 - 1.a Emission Limitations:
0.77 lb PE/hour and 3.37 tons PE/year, from stack emissions

Applicable Compliance Method:

Compliance with the hourly PE limitation may be determined by using the following equation:

$$PE \text{ (baghouse stack)} = (ERC) + (NC) + (CC)$$

$$\begin{aligned} ERC &= PE \text{ from Energy Room Collector baghouse system} \\ ERC &= (0.004 \text{ gr/dscf})(4800 \text{ dscf/min})(60 \text{ min/hr})(1 \text{ lb/7000 gr}) \\ ERC &= 0.16 \text{ lb PE/hr} \end{aligned}$$

$$\begin{aligned} NC &= PE \text{ from North Collector baghouse system} \\ NC &= (0.004 \text{ gr/dscf})(8000 \text{ dscf/min})(60 \text{ min/hr})(1 \text{ lb/7000 gr}) \\ NC &= 0.27 \text{ lb PE/hr} \end{aligned}$$

$$\begin{aligned} CC &= PE \text{ from Central Collector baghouse system} \\ CC &= (0.004 \text{ gr/dscf})(10,000 \text{ dscf/min})(60 \text{ min/hr})(1 \text{ lb/7000 gr}) \\ CC &= 0.34 \text{ lb PE/hr} \end{aligned}$$

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The annual limitation was developed by multiplying the hourly limitation by 8760, and dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance then shall also be shown with the annual limitation.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
2.15 tons PE/year (fugitive emissions)

Applicable Compliance Method:

Fugitive particulate emissions are exhausted through the ventilation system of the building containing the secondary finishing operations. The company-supplied emission factor of 2.04×10^{-8} lb PE/ft³ was derived from actual testing of the air in the secondary finishing operations building. The annual emission limitation was developed using the company-supplied emission factor, a maximum volumetric flow rate of 24,000,000 ft³ per hour from the building ventilation system, a maximum operating schedule of 8,760 hour per year, and dividing by 2000 lbs/ton. The tons per year limitation represents the potential to emit of fugitive particulate emissions; therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

- 1.c** Emission Limitation:
0.004 gr/dscf

Applicable Compliance Method:

The permittee may demonstrate compliance based on a manufacturer's guaranteed outlet grain loading of 0.004 gr/dscf.

If required, the permittee shall demonstrate compliance with the PE limitation above pursuant to Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

- 1.d** Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the methods in OAC rule 3745-17-03(B)(1)

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
plastic automotive parts spray booth, with water wash and baffles	OAC rule 3745-31-05 (PTI 03-13051)	Organic compounds (OC) shall not exceed 15.0 pounds per hour, from the application of coatings.
		OC emissions shall not exceed 173.0 pounds per month, from the application of cleanup materials.
		OC emissions shall not exceed 124.0 tons per year, based upon a rolling, 12-month summation of the monthly OC input rates [for emissions units R012, R013, R014 and R015, combined] (see A.I.2.a).
		OC emissions shall not exceed 66.70 tons per year, from all the coatings and cleanup materials
		Particulate emissions (PE) shall not exceed 0.10 pound per hour and 0.44 ton per year.
		Visible PE shall not exceed 0% opacity, as a six-minute average.
	OAC rule 3745-21-07(G)	See A.I.2.b.
	OAC rule 3745-17-07(A)	none (See A.II.1.)
	OAC rule 3745-17-11(B)	See A.I.2.c.
		See A.I.2.c.

2. Additional Terms and Conditions

- 2.a** The monthly OC input rate for emissions units R012, R013, R014 and R015, combined, equals the summation of (C) x (D); where C is the number of gallons of each coating and cleanup material employed per month and D is the OC content of each coating and cleanup material employed, in pounds of OC per gallon of coating or cleanup material. The monthly OC input rates are equivalent to monthly OC emission rates and, in the absence of add-on controls, are based upon 100% of the solvent in the coating and/or cleanup materials being emitted.
- 2.b** The 15 lbs/hr, 173 lbs/month and 66.7 tons/yr OC emission limitations specified in Section A.I.1 above were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these emission limitations.
- 2.c** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

- 1.** The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.
- 2.** The permittee shall operate the water wash and baffles when the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1.** The permittee shall collect and record the following information for each month for emissions units R012, R013, R014 and R015, combined:
 - 1.a** the company identification for each coating and cleanup material employed;
 - 1.b** the number of gallons of each coating and cleanup material employed;
 - 1.c** the OC content of each coating and cleanup material, in pounds per gallon, as applied;
 - 1.d** the OC input (emission) rate for each coating and cleanup material employed [(c) x (d)/2000], in tons;
 - 1.e** the total OC emission rate for all the coatings and cleanup materials employed [summation of e for all coatings and cleanup materials], in tons; and
 - 1.f** the rolling, 12-month summation of the monthly OC emission rates, in tons.
- 2.** The permittee shall collect and record the following information for each month for this emissions unit:
 - a.** the company identification for each coating and cleanup material employed; and
 - b.** documentation on whether or not each coating or cleanup material is a photochemically reactive material.
- 3.** The permittee shall maintain daily records that document any time periods when the water wash and baffles were not in service when the emissions unit was in operation.

IV. Reporting Requirements

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

IV. Reporting Requirements (continued)

2. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any noncomplying (i.e., photochemically reactive) coating or cleanup material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the exceedance occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 124 tons (for emissions units R012, R013, R014 and R015, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions for emissions units R012, R013, R014, and R015, combined. These reports shall be submitted as required by the Fee Emissions reports pursuant to OAC rule 3745-78-02(A).

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
OC emissions shall not exceed 15.0 pounds per hour, from the application of coating materials

Applicable Compliance Method:

The hourly allowable OC emission limitation was established by multiplying the maximum hourly coating usage rate (3.37 gallons) by the maximum OC content of all the coatings employed (4.45 pounds per gallon).
 - 1.b Emission Limitation:
OC emissions shall not exceed 173.0 pounds per month, from the application of cleanup materials

Applicable Compliance Method:
The monthly allowable OC emission limitation was established by multiplying the maximum monthly cleanup material usage rate (25 gallons) by the maximum OC content of all the cleanup materials employed (6.92 pounds per gallon).
 - 1.c Emission Limitation:
OC emissions shall not exceed 124.0 tons per year, based upon a rolling, 12-month summation of the monthly OC input rates (for emissions units R012, R013, R014 and R015)

Applicable Compliance Method:
Compliance with the annual allowable OC emission limitation shall be demonstrated through the record keeping required pursuant to Section A.III.1 of the terms and conditions of this permit.
 - 1.d Emission Limitation:
OC emissions shall not exceed 66.7 tons per year, from all the coatings and cleanup materials

Applicable Compliance Method:
The annual allowable OC emission limitation was established by:
 - i. multiplying the hourly allowable OC emission limitation (from the coatings usage) by 8760, and then dividing by 2000;
 - ii. multiplying the monthly allowable OC emission limitation (from the cleanup materials usage) by 12, and then dividing by 2000;
 - iii. adding 1.d.i + 1.d.ii.

V. Testing Requirements (continued)

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

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

- 1.f** Emission Limitations:
PE shall not exceed 0.10 pound per hour and 0.44 ton per year.

Applicable Compliance Method:

To determine the actual worst case emission rate for PE, the following equation may be used:

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

where:

E = PE rate (lbs/hr),

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

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

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

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

Compliance with the annual PE limitation shall be assumed as long as compliance with the hourly PE limitation is maintained. The annual PE limitation was established by multiplying the hourly PE limitation by 8760 hours, and then dividing by 2000.

- 1.g** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
plastic automotive parts spray booth, with water wash and baffles	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for emissions units R012, R013, R014, and R015 was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MIBK
 TLV (ug/m3): 205,000
 Maximum Hourly Emission Rate (lbs/hr): 15.00
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 670.7
 MAGLC (ug/m3): 4880.0

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

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:
 - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth #2 (R013)

Activity Description: Primer Spray Booth #2

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
plastic automotive parts spray booth, with water wash and baffles	OAC rule 3745-31-05 (PTI 03-13051)	Organic compounds (OC) shall not exceed 15.0 pounds per hour, from the application of coatings.
		OC emissions shall not exceed 173.0 pounds per month, from the application of cleanup materials.
		OC emissions shall not exceed 124.0 tons per year, based upon a rolling, 12-month summation of the monthly OC input rates [for emissions units R012, R013, R014 and R015, combined] (see A.I.2.a).
		OC emissions shall not exceed 66.70 tons per year, from all the coatings and cleanup materials
		Particulate emissions (PE) shall not exceed 0.10 pound per hour and 0.44 ton per year.
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		See A.I.2.b.
	OAC rule 3745-21-07(G)	none (See A.II.1.)
	OAC rule 3745-17-07(A)	See A.I.2.c.
	OAC rule 3745-17-11(B)	See A.I.2.c.

2. Additional Terms and Conditions

- 2.a The monthly OC input rate for emissions units R012, R013, R014 and R015, combined, equals the summation of (C) x (D); where C is the number of gallons of each coating and cleanup material employed per month and D is the OC content of each coating and cleanup material employed, in pounds of OC per gallon of coating or cleanup material. The monthly OC input rates are equivalent to monthly OC emission rates and, in the absence of add-on controls, are based upon 100% of the solvent in the coating and/or cleanup materials being emitted.
- 2.b The 15 lbs/hr, 173 lbs/month and 66.7 tons/yr OC emission limitations specified in Section A.I.1 above were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these emission limitations.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

- 1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.
- 2. The permittee shall operate the water wash and baffles when the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information for each month for emissions units R012, R013, R014 and R015, combined:
 - 1.a the company identification for each coating and cleanup material employed;
 - 1.b the number of gallons of each coating and cleanup material employed;
 - 1.c the OC content of each coating and cleanup material, in pounds per gallon, as applied;
 - 1.d the OC input (emission) rate for each coating and cleanup material employed [(c) x (d)/2000], in tons;
 - 1.e the total OC emission rate for all the coatings and cleanup materials employed [summation of e for all coatings and cleanup materials], in tons; and
 - 1.f the rolling, 12-month summation of the monthly OC emission rates, in tons.
- 2. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each coating and cleanup material employed; and
 - b. documentation on whether or not each coating or cleanup material is a photochemically reactive material.
- 3. The permittee shall maintain daily records that document any time periods when the water wash and baffles were not in service when the emissions unit was in operation.

IV. Reporting Requirements

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

IV. Reporting Requirements (continued)

2. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any noncomplying (i.e., photochemically reactive) coating or cleanup material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the exceedance occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 124 tons (for emissions units R012, R013, R014 and R015, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions for emissions units R012, R013, R014, and R015, combined. These reports shall be submitted as required by the Fee Emissions reports pursuant to OAC rule 3745-78-02(A).

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
OC emissions shall not exceed 15.0 pounds per hour, from the application of coating materials

Applicable Compliance Method:

The hourly allowable OC emission limitation was established by multiplying the maximum hourly coating usage rate (3.37 gallons) by the maximum OC content of all the coatings employed (4.45 pounds per gallon).
 - 1.b Emission Limitation:
OC emissions shall not exceed 173.0 pounds per month, from the application of cleanup materials

Applicable Compliance Method:
The monthly allowable OC emission limitation was established by multiplying the maximum monthly cleanup material usage rate (25 gallons) by the maximum OC content of all the cleanup materials employed (6.92 pounds per gallon).
 - 1.c Emission Limitation:
OC emissions shall not exceed 124.0 tons per year, based upon a rolling, 12-month summation of the monthly OC input rates (for emissions units R012, R013, R014 and R015)

Applicable Compliance Method:
Compliance with the annual allowable OC emission limitation shall be demonstrated through the record keeping required pursuant to Section A.III.1 of the terms and conditions of this permit.
 - 1.d Emission Limitation:
OC emissions shall not exceed 66.7 tons per year, from all the coatings and cleanup materials

Applicable Compliance Method:
The annual allowable OC emission limitation was established by:
 - i. multiplying the hourly allowable OC emission limitation (from the coatings usage) by 8760, and then dividing by 2000;
 - ii. multiplying the monthly allowable OC emission limitation (from the cleanup materials usage) by 12, and then dividing by 2000;
 - iii. adding 1.d.i + 1.d.ii.

V. Testing Requirements (continued)

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

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

- 1.f** Emission Limitations:
PE shall not exceed 0.10 pound per hour and 0.44 ton per year.

Applicable Compliance Method:

To determine the actual worst case emission rate for PE, the following equation may be used:

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

where:

E = PE rate (lbs/hr),

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

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

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

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

Compliance with the annual PE limitation shall be assumed as long as compliance with the hourly PE limitation is maintained. The annual PE limitation was established by multiplying the hourly PE limitation by 8760 hours, and then dividing by 2000.

- 1.g** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
plastic automotive parts spray booth, with water wash and baffles	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for emissions units R012, R013, R014, and R015 was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MIBK
 TLV (ug/m3): 205,000
 Maximum Hourly Emission Rate (lbs/hr): 15.00
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 670.7
 MAGLC (ug/m3): 4880.0

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

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:
 - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth #3 (R014)
Activity Description: Primer Spray Booth #3

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>
plastic automotive parts spray booth, with water wash and baffles	OAC rule 3745-31-05 (PTI 03-13051)	Organic compounds (OC) shall not exceed 15.0 pounds per hour, from the application of coatings. OC emissions shall not exceed 173.0 pounds per month, from the application of cleanup materials. OC emissions shall not exceed 124.0 tons per year, based upon a rolling, 12-month summation of the monthly OC input rates [for emissions units R012, R013, R014 and R015, combined] (see A.I.2.a). OC emissions shall not exceed 66.70 tons per year, from all the coatings and cleanup materials Particulate emissions (PE) shall not exceed 0.10 pound per hour and 0.44 ton per year. Visible PE shall not exceed 0% opacity, as a six-minute average.
	OAC rule 3745-21-07(G)	See A.I.2.b.
	OAC rule 3745-17-07(A)	none (See A.II.1.)
	OAC rule 3745-17-11(B)	See A.I.2.c.
		See A.I.2.c.

2. Additional Terms and Conditions

- 2.a The monthly OC input rate for emissions units R012, R013, R014 and R015, combined, equals the summation of (C) x (D); where C is the number of gallons of each coating and cleanup material employed per month and D is the OC content of each coating and cleanup material employed, in pounds of OC per gallon of coating or cleanup material. The monthly OC input rates are equivalent to monthly OC emission rates and, in the absence of add-on controls, are based upon 100% of the solvent in the coating and/or cleanup materials being emitted.
- 2.b The 15 lbs/hr, 173 lbs/month and 66.7 tons/yr OC emission limitations specified in Section A.I.1 above were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these emission limitations.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

- 1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.
- 2. The permittee shall operate the water wash and baffles when the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information for each month for emissions units R012, R013, R014 and R015, combined:
 - 1.a the company identification for each coating and cleanup material employed;
 - 1.b the number of gallons of each coating and cleanup material employed;
 - 1.c the OC content of each coating and cleanup material, in pounds per gallon, as applied;
 - 1.d the OC input (emission) rate for each coating and cleanup material employed [(c) x (d)/2000], in tons;
 - 1.e the total OC emission rate for all the coatings and cleanup materials employed [summation of e for all coatings and cleanup materials], in tons; and
 - 1.f the rolling, 12-month summation of the monthly OC emission rates, in tons.
- 2. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each coating and cleanup material employed; and
 - b. documentation on whether or not each coating or cleanup material is a photochemically reactive material.
- 3. The permittee shall maintain daily records that document any time periods when the water wash and baffles were not in service when the emissions unit was in operation.

IV. Reporting Requirements

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

IV. Reporting Requirements (continued)

2. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any noncomplying (i.e., photochemically reactive) coating or cleanup material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the exceedance occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 124 tons (for emissions units R012, R013, R014 and R015, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions for emissions units R012, R013, R014, and R015, combined. These reports shall be submitted as required by the Fee Emissions reports pursuant to OAC rule 3745-78-02(A).

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
OC emissions shall not exceed 15.0 pounds per hour, from the application of coating materials

Applicable Compliance Method:

The hourly allowable OC emission limitation was established by multiplying the maximum hourly coating usage rate (3.37 gallons) by the maximum OC content of all the coatings employed (4.45 pounds per gallon).
 - 1.b Emission Limitation:
OC emissions shall not exceed 173.0 pounds per month, from the application of cleanup materials

Applicable Compliance Method:
The monthly allowable OC emission limitation was established by multiplying the maximum monthly cleanup material usage rate (25 gallons) by the maximum OC content of all the cleanup materials employed (6.92 pounds per gallon).
 - 1.c Emission Limitation:
OC emissions shall not exceed 124.0 tons per year, based upon a rolling, 12-month summation of the monthly OC input rates (for emissions units R012, R013, R014 and R015)

Applicable Compliance Method:
Compliance with the annual allowable OC emission limitation shall be demonstrated through the record keeping required pursuant to Section A.III.1 of the terms and conditions of this permit.
 - 1.d Emission Limitation:
OC emissions shall not exceed 66.7 tons per year, from all the coatings and cleanup materials

Applicable Compliance Method:
The annual allowable OC emission limitation was established by:
 - i. multiplying the hourly allowable OC emission limitation (from the coatings usage) by 8760, and then dividing by 2000;
 - ii. multiplying the monthly allowable OC emission limitation (from the cleanup materials usage) by 12, and then dividing by 2000;
 - iii. adding 1.d.i + 1.d.ii.

V. Testing Requirements (continued)

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

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

- 1.f** Emission Limitations:
PE shall not exceed 0.10 pound per hour and 0.44 ton per year.

Applicable Compliance Method:

To determine the actual worst case emission rate for PE, the following equation may be used:

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

where:

E = PE rate (lbs/hr),

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

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

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

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

Compliance with the annual PE limitation shall be assumed as long as compliance with the hourly PE limitation is maintained. The annual PE limitation was established by multiplying the hourly PE limitation by 8760 hours, and then dividing by 2000.

- 1.g** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
plastic automotive parts spray booth, with water wash and baffles	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for emissions units R012, R013, R014, and R015 was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MIBK
 TLV (ug/m3): 205,000
 Maximum Hourly Emission Rate (lbs/hr): 15.00
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 670.7
 MAGLC (ug/m3): 4880.0

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

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:
 - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth #4 (R015)

Activity Description: Primer Spray Booth #4

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
plastic automotive parts spray booth, with water wash and baffles	OAC rule 3745-31-05 (PTI 03-13051)	Organic compounds (OC) shall not exceed 15.0 pounds per hour, from the application of coatings.
		OC emissions shall not exceed 173.0 pounds per month, from the application of cleanup materials.
		OC emissions shall not exceed 124.0 tons per year, based upon a rolling, 12-month summation of the monthly OC input rates [for emissions units R012, R013, R014 and R015, combined] (see A.I.2.a).
		OC emissions shall not exceed 66.70 tons per year, from all the coatings and cleanup materials
		Particulate emissions (PE) shall not exceed 0.10 pound per hour and 0.44 ton per year.
		Visible PE shall not exceed 0% opacity, as a six-minute average.
	OAC rule 3745-21-07(G)	See A.I.2.b.
	OAC rule 3745-17-07(A)	none (See A.II.1.)
	OAC rule 3745-17-11(B)	See A.I.2.c.
		See A.I.2.c.

2. Additional Terms and Conditions

- 2.a** The monthly OC input rate for emissions units R012, R013, R014 and R015, combined, equals the summation of (C) x (D); where C is the number of gallons of each coating and cleanup material employed per month and D is the OC content of each coating and cleanup material employed, in pounds of OC per gallon of coating or cleanup material. The monthly OC input rates are equivalent to monthly OC emission rates and, in the absence of add-on controls, are based upon 100% of the solvent in the coating and/or cleanup materials being emitted.
- 2.b** The 15 lbs/hr, 173 lbs/month and 66.7 tons/yr OC emission limitations specified in Section A.I.1 above were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these emission limitations.
- 2.c** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

- 1.** The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.
- 2.** The permittee shall operate the water wash and baffles when the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1.** The permittee shall collect and record the following information for each month for emissions units R012, R013, R014 and R015, combined:
 - 1.a** the company identification for each coating and cleanup material employed;
 - 1.b** the number of gallons of each coating and cleanup material employed;
 - 1.c** the OC content of each coating and cleanup material, in pounds per gallon, as applied;
 - 1.d** the OC input (emission) rate for each coating and cleanup material employed [(c) x (d)/2000], in tons;
 - 1.e** the total OC emission rate for all the coatings and cleanup materials employed [summation of e for all coatings and cleanup materials], in tons; and
 - 1.f** the rolling, 12-month summation of the monthly OC emission rates, in tons.
- 2.** The permittee shall collect and record the following information for each month for this emissions unit:
 - a.** the company identification for each coating and cleanup material employed; and
 - b.** documentation on whether or not each coating or cleanup material is a photochemically reactive material.
- 3.** The permittee shall maintain daily records that document any time periods when the water wash and baffles were not in service when the emissions unit was in operation.

IV. Reporting Requirements

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

IV. Reporting Requirements (continued)

2. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any noncomplying (i.e., photochemically reactive) coating or cleanup material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the exceedance occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 124 tons (for emissions units R012, R013, R014 and R015, combined). These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions for emissions units R012, R013, R014, and R015, combined. These reports shall be submitted as required by the Fee Emissions reports pursuant to OAC rule 3745-78-02(A).

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
OC emissions shall not exceed 15.0 pounds per hour, from the application of coating materials

Applicable Compliance Method:

The hourly allowable OC emission limitation was established by multiplying the maximum hourly coating usage rate (3.37 gallons) by the maximum OC content of all the coatings employed (4.45 pounds per gallon).
 - 1.b Emission Limitation:
OC emissions shall not exceed 173.0 pounds per month, from the application of cleanup materials

Applicable Compliance Method:
The monthly allowable OC emission limitation was established by multiplying the maximum monthly cleanup material usage rate (25 gallons) by the maximum OC content of all the cleanup materials employed (6.92 pounds per gallon).
 - 1.c Emission Limitation:
OC emissions shall not exceed 124.0 tons per year, based upon a rolling, 12-month summation of the monthly OC input rates (for emissions units R012, R013, R014 and R015)

Applicable Compliance Method:
Compliance with the annual allowable OC emission limitation shall be demonstrated through the record keeping required pursuant to Section A.III.1 of the terms and conditions of this permit.
 - 1.d Emission Limitation:
OC emissions shall not exceed 66.7 tons per year, from all the coatings and cleanup materials

Applicable Compliance Method:
The annual allowable OC emission limitation was established by:
 - i. multiplying the hourly allowable OC emission limitation (from the coatings usage) by 8760, and then dividing by 2000;
 - ii. multiplying the monthly allowable OC emission limitation (from the cleanup materials usage) by 12, and then dividing by 2000;
 - iii. adding 1.d.i + 1.d.ii.

V. Testing Requirements (continued)

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

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

- 1.f** Emission Limitations:
PE shall not exceed 0.10 pound per hour and 0.44 ton per year.

Applicable Compliance Method:

To determine the actual worst case emission rate for PE, the following equation may be used:

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

where:

E = PE rate (lbs/hr),

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

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

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

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

Compliance with the annual PE limitation shall be assumed as long as compliance with the hourly PE limitation is maintained. The annual PE limitation was established by multiplying the hourly PE limitation by 8760 hours, and then dividing by 2000.

- 1.g** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
plastic automotive parts spray booth, with water wash and baffles	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for emissions units R012, R013, R014, and R015 was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MIBK
 TLV (ug/m3): 205,000
 Maximum Hourly Emission Rate (lbs/hr): 15.00
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 670.7
 MAGLC (ug/m3): 4880.0

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

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:
 - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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