



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

**RE: DRAFT PERMIT TO INSTALL
ASHTABULA COUNTY
Application No: 02-18224**

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
WWW	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
Y	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 2/10/2004

Venture Holdings Corporation
David Murtha
333 Gore Rd
Conneaut, OH 44030

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$6825** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPANEDO

Eastgate Development & Transportation

NY

PA

ASHTABULA COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 02-18224 FOR AN AIR CONTAMINANT SOURCE FOR
VENTURE HOLDINGS CORPORATION**

On 2/10/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Venture Holdings Corporation**, located at **333 Gore Rd, Conneaut, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-18224:

modification to increase emissions at 15 presses and at P027, to decrease emissions at 2 presses, to establish separate emissions limits for mixer 1, and to install P029.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087 [(330)425-9171]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 02-18224

Application Number: 02-18224

APS Premise Number: 0204020245

Permit Fee: **To be entered upon final issuance**

Name of Facility: Venture Holdings Corporation

Person to Contact: David Murtha

Address: 333 Gore Rd
Conneaut, OH 44030

Location of proposed air contaminant source(s) [emissions unit(s)]:

**333 Gore Rd
Conneaut, Ohio**

Description of proposed emissions unit(s):

modification to increase emissions at 15 presses and at P027, to decrease emissions at 2 presses, to establish separate emissions limits for mixer 1, and to install P029.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. 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. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

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

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or

condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. 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.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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 ORC section 3704.08.
 - 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.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or

modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. 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.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

8. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. 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.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	4.56
OC	150.47

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

1. On April 21, 2003 U.S. EPA promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, 40 CFR 63 Subpart WWWW. When the NESHAP is promulgated, the facility may be subject as an existing major source with a compliance date as specified in the NESHAP.

Within 60 days following completion of any required compliance demonstration activity specified in 40 CFR Part 63 Subpart WWWW, the permittee shall submit a notification of compliance status that contains the following information:

- a. The methods used to determine compliance;
- b. The results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
- c. The methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;
- d. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR Part 63 Subpart WWWW;
- e. An analysis demonstrating whether the affected source is a major source or an area source;
- f. A description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and
- g. A statement of whether or not the permittee has complied with the requirements of 40 CFR Part 63 Subpart WWWW.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P001 - 24 inch sheet mold compound (SMC) machine no. 1 - administrative modification of PTI 02-896, issued on February 19, 1982.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 261.1 lbs/week from cleanup/purge operations. OC emissions shall not exceed 14.09 tons/year from production operations and from cleanup/purge operations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and the requirements of 40 CFR Parts 63.5780 - 63.5935. See sections A.I.2.a. and A.II.1.
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day from production operations.
	40 CFR, Part 63, Subpart WWWW	See section A.2.b. and Part II section A.

2. Additional Terms and Conditions

- 2.a The OC emissions from the production operations consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) .
- 2.b The following work practice(s) shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and specified in Table 4 of 40 CFR, Part 63, Subpart WWWW:
 - i. the resin delivery system to the doctor box on each SMC manufacturing machine must be closed or covered. The doctor box itself may be open;
 - ii. a nylon containing film must be used to enclose SMC; and
 - iii. the use of HAP containing cleaning solvents is prohibited, except that styrene may be used as a cleaner in closed systems.

II. Operational Restrictions

1. The use of photochemically reactive cleanup/purge materials is prohibited for open cleanup/purge operations.

III. Monitoring and/or Record keeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of production operations and cleanup operations associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize HAP emissions are employed. The inspections shall be performed during representative, normal operating conditions.
2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each SMC material and each cleanup/purge material employed;
 - b. the weight of each polyester SMC material employed, in pounds per day;
 - c. the total OC content of each polyester SMC material employed, in percent by weight;
 - d. the total OC emissions rate for all polyester SMC materials, in pounds per day;
 - e. the actual number of hours that the emissions unit was in operation;
 - f. the average hourly OC emissions rate for all polyester SMC materials, i.e., (d) divided by (e), in pounds per hour (average);
 - g. the date and reason any required inspection was not performed; and
 - h. the dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.
3. The permittee shall collect and record the following information for each week for this emissions unit:
 - a. the company identification of each cleanup/purge material employed;
 - b. the total volume of each cleanup/purge material applied, in gallons;
 - c. the OC content of each cleanup/purge material applied, in pound per gallon;
 - d. if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports, records of the total amount (gallons) of cleanup and purge material collected from this emissions unit and added to the recovery tank/drum, for recycle/recovery and/or disposal at an outside facility, shall be maintained as required in Section A.III.3.;

- e. if a credit for recovered cleanup/purge material is used, the volume of this material added to the recovery tank/drum, in gallons per week;
 - f. if a credit for recovered materials is used, the adjusted volume of cleanup/purge materials employed, calculate by subtracting the volume of the recovered cleanup/purge material added to the recovery tank/drum (d), from the volume of the total cleanup/purge material applied (b), in gallons per week; and
 - g. the total OC emissions rate for all cleanup/purge materials, in pounds per week.
4. If a credit for recovered materials from this emissions unit is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup and purge materials, and the recovery drum or tank serving this emissions unit:
 - a. the date the materials from the recovery drum or tank were shipped off site; and
 - b. the number of gallons of materials from the recovery drum or tank shipped off site
 5. The permittee shall maintain information to document that each cleanup/purge material applied in this emissions unit is non-photochemically reactive.
 6. The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each record. Retention of copies of the semi-annual compliance report(s) , required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly OC emissions from the production operations exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. an identification of each day during which the OC emissions from the production operations exceeded 40 pounds per day, and the actual OC emissions for each such day;
 - c. an identification of each week during which the OC emissions from the cleanup/purge operations exceeded 261.1 pounds per week, and the actual OC emissions for each such week; and
 - d. an identification of each day during which any photochemically reactive cleanup/purge materials were employed.

2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which include certified statements in the notice of compliance status that state the following:
 - a. the resin delivery system to the doctor box on each SMC manufacturing machine was closed or covered;
 - b. a nylon containing film must was used to enclose SMC; and
 - c. no HAP containing cleaning solvents were used, except that styrene may be used as a cleaner in closed systems.

The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date. The initial compliance report must be submitted by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

3. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:
 - a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirements in section A.I.2.d., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.
 - b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:
 - i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - iii. Date of the report and beginning and ending dates of the reporting period;
 - iv. The total operating time of this emissions unit; and
 - v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.
 - c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).

4. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 of each year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation: 8 lbs OC/hr from production operations.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.f. If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emissions Limitation: 40 lbs OC/day from production operations.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.d. Compliance may be determined based upon the following equation:

$$EP_{OC} = (\text{summation of } W_i \times OC_i) \times EF(OC).$$

where:

EP_{OC} = OC emissions as styrene from the polyester SMC compound production operations, in pounds per day.

W_i = the weight of SMC "i" produced, in pounds per day.

OC_i = the styrene content of SMC "i", in percent by weight.

$EF(OC)$ = the styrene emissions factor, in 0.0012 pound of styrene emissions per pound of available styrene content, as determined from a Budd Plastics Division study, as presented to the October, 1999 Composite Fabricators Association Conference.

- c. Emission Limitation: 261.1 lbs OC/week from cleanup/purge operations.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.3.g. Compliance may be determined based upon the following equation:

$EC(OC) = \text{summation of } (V_i \times OC_i).$

where:

$EC(OC) = OC$ emissions from the cleanup/purge operations, in pounds per day.

$V_i =$ the volume of cleanup/purge material applied, from Sections A.III.3.b. or A.III.3.f., in gallons per day.

$OC_i =$ the OC content of cleanup/purge material "i", in per pounds per gallon.

- d. Emissions Limitation: 14.09 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the production operations, EP_{OC} , added to the sum of the daily OC emissions rates from the cleanup/purge operations, EC_{OC} , as specified in section E.1.b. and E.1.c., respectively, of this permit for the calendar year, and shall be divided by 2,000 pounds/ton.

2. Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
P001 - 24 inch sheet mold compound (SMC) machine no. 1 - administrative modification of PTI 02-896, issued on February 19, 1982.		Compliance with the Air Toxic Policy as specified in Sections B.III.1. and B.III.2.

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Record keeping Requirements

- 1. Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA’s “Air Toxic Policy” was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.
- 2. Modeling ethyl acetate pollutant emissions to demonstrate compliance with the Ohio EPA’s “Air Toxic Policy” was not necessary because there will be no increase in the air toxic compound emissions (i.e. ethyl acetate) from this emissions unit. The emissions are below the Ohio modeling significant emission rates. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant above the Ohio modeling significant emission rate may require the permittee to apply for and obtain a new permit to install.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P005 - Injection mold press no. 1 with a slitter system for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.96 lb/hr, 23.16 lbs/day and 4.23 tons/year. The requirements of this rule also include compliance with the requirement of the daily limit in OAC rule 3745-21-07(G)(2) and the requirements of 40 CFR Parts 63.5780 - 63.5935. See section A.2.a.
	OAC rule 3745-21-07(G)(2)	The hourly and daily emissions limitation specified by this rule are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 63, Subpart WWWW	See section A.2.b. and Part II section A.

2. Additional Terms and Conditions

2.a The OC emissions from the molding operations consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) .

2.b The following work practice(s) shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and specified in Table 4 of 40 CFR, Part 63, Subpart WWWW:

- i. only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
- ii. mold compound materials may be uncovered before slitting, but must be recovered after slitting.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1.** Except as otherwise provided in this section, the permittee shall perform inspections of production material charges associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize HAP emissions are employed. The inspections shall be performed during representative, normal operating conditions.
- 2.** The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each sheet mold compound (SMC) employed;
 - b. The weight of each sheet mold compound (SMC) employed, in pounds;
 - c. The weight of all sheet mold compound (SMC) employed, in pounds;
 - d. The total OC emission rate for all materials employed, in pounds;
 - e. The actual number of hours the emissions unit was in operation;
 - f. The average hourly OC emission rate for all materials employed, i.e., (d)/(e), in pounds per hour (average);
 - g. The date and reason any required inspection was not performed; and
 - h. The dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.
- 3.** The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each record. Retention of copies of the semi-annual compliance report(s), required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

IV. Reporting Requirements

- 1.** The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the production materials exceeded 0.96 pound per hour, and the actual average hourly OC emissions for each such day;

- b. An identification of each day during which the OC emissions from the production materials exceeded 23.16 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which include certified statements in the notice of compliance status that state the following:
 - a. only one charge of molding compound was uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - b. mold compound materials were recovered after slitting.

The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date. The initial compliance report must be submitted by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

3. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:
 - a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirements in section A.I.2.b., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.
 - b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:
 - i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - iii. Date of the report and beginning and ending dates of the reporting period;
 - iv. The total operating time of this emissions unit; and
 - v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.
 - c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).

4. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year, in tons/year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation: 0.96 lb OC/hr.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.f. If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emissions Limitation: 23.16 lbs OC/day.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.d. Compliance may be determined based upon the following equation:

$$E_{OC} = \text{summation of } (W_{i_SMC} \times EF).$$

where:

E_{OC} = the daily, OC emissions for all materials, in pounds per day.

W_{i_SMC} = the weight of SMC "i" employed, in pounds per day.

EF = emission factor for styrene emissions from the mold press, which is 0.00134 pounds per pound of mold compound materials, as determined from a Society of Plastics Industry report, "Styrene Emissions during the Charging and Molding Cycle."

- c. Emissions Limitation: 4.23 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the mold compounds, E_{OC} , as specified in section E.1.b. of this permit for the calendar year, divided by 2,000 pounds/ton.

2. Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require

the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
P005 - Injection mold press no. 1 with a slitter system for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.		Compliance with the Air Toxic Policy as specified in Section B.III.1.

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1. Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA’s “Air Toxic Policy” was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P006 - Injection mold press no. 2 with a slitter system for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.96 lb/hr, 23.16 lbs/day and 4.23 tons/year. The requirements of this rule also include compliance with the requirement of the daily limit in OAC rule 3745-21-07(G)(2) and the requirements of 40 CFR Parts 63.5780 - 63.5935. See section A.2.a.
	OAC rule 3745-21-07(G)(2)	The hourly and daily emissions limitation specified by this rule are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 63, Subpart WWWW	See section A.2.b. and Part II section A.

2. Additional Terms and Conditions

- 2.a The OC emissions from the molding operations consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) .
- 2.b The following work practice(s) shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and specified in Table 4 of 40 CFR, Part 63, Subpart WWWW:
 - i. only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - ii. mold compound materials may be uncovered before slitting, but must be recovered after slitting.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of production material charges associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize HAP emissions are employed. The inspections shall be performed during representative, normal operating conditions.
2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each sheet mold compound (SMC) employed;
 - b. The weight of each sheet mold compound (SMC) employed, in pounds;
 - c. The weight of all sheet mold compound (SMC) employed, in pounds;
 - d. The total OC emission rate for all materials employed, in pounds;
 - e. The actual number of hours the emissions unit was in operation;
 - f. The average hourly OC emission rate for all materials employed, i.e., (d)/(e), in pounds per hour (average);
 - g. The date and reason any required inspection was not performed; and
 - h. The dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.
3. The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each record. Retention of copies of the semi-annual compliance report(s), required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the production materials exceeded 0.96 pound per hour, and the actual average hourly OC emissions for each such day;

- b. An identification of each day during which the OC emissions from the production materials exceeded 23.16 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which include certified statements in the notice of compliance status that state the following:
 - a. only one charge of molding compound was uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - b. mold compound materials were recovered after slitting.

The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date. The initial compliance report must be submitted by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

3. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:
 - a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirements in section A.I.2.b., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.
 - b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:
 - i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - iii. Date of the report and beginning and ending dates of the reporting period;
 - iv. The total operating time of this emissions unit; and
 - v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.
 - c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).

4. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year, in tons/year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation: 0.96 lb OC/hr.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.f. If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emissions Limitation: 23.16 lbs OC/day.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.d. Compliance may be determined based upon the following equation:

$$E_{OC} = \text{summation of } (W_{i_SMC} \times EF).$$

where:

E_{OC} = the daily, OC emissions for all materials, in pounds per day.

W_{i_SMC} = the weight of SMC "i" employed, in pounds per day.

EF = emission factor for styrene emissions from the mold press, which is 0.00134 pounds per pound of mold compound materials, as determined from a Society of Plastics Industry report, "Styrene Emissions during the Charging and Molding Cycle."

- c. Emissions Limitation: 4.23 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the mold compounds, E_{OC} , as specified in section E.1.b. of this permit for the calendar year, divided by 2,000 pounds/ton.

2. Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require

the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
P006 - Injection mold press no. 2 with a slitter system for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.		Compliance with the Air Toxic Policy as specified in Section B.III

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1. Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA’s “Air Toxic Policy” was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P007 - Injection mold press no. 3 with a slitter system for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.80 lb/hr, 19.30 lbs/day and 3.52 tons/year. The requirements of this rule also include compliance with the requirement of the daily limit in OAC rule 3745-21-07(G)(2) and the requirements of 40 CFR Parts 63.5780 - 63.5935. See section A.2.a.
	OAC rule 3745-21-07(G)(2)	The hourly and daily emissions limitation specified by this rule are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 63, Subpart WWWW	See section A.2.b. and Part II section A.

2. Additional Terms and Conditions

- 2.a The OC emissions from the molding operations consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) .
- 2.b The following work practice(s) shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and specified in Table 4 of 40 CFR, Part 63, Subpart WWWW:
 - i. only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - ii. mold compound materials may be uncovered before slitting, but must be recovered after slitting.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of production material charges associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize HAP emissions are employed. The inspections shall be performed during representative, normal operating conditions.
2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each sheet mold compound (SMC) employed;
 - b. The weight of each sheet mold compound (SMC) employed, in pounds;
 - c. The weight of all sheet mold compound (SMC) employed, in pounds;
 - d. The total OC emission rate for all materials employed, in pounds;
 - e. The actual number of hours the emissions unit was in operation;
 - f. The average hourly OC emission rate for all materials employed, i.e., (d)/(e), in pounds per hour (average);
 - g. The date and reason any required inspection was not performed; and
 - h. The dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.
3. The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each record. Retention of copies of the semi-annual compliance report(s), required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the production materials exceeded 0.80 pound per hour, and the actual average hourly OC emissions for each such day;
 - b. An identification of each day during which the OC emissions from the production materials exceeded 19.30 pounds per day, and the actual OC emissions for each such day.

2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which include certified statements in the notice of compliance status that state the following:
 - a. only one charge of molding compound was uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - b. mold compound materials were recovered after slitting.

The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date. The initial compliance report must be submitted by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

3. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:
 - a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirements in section A.I.2.b., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.
 - b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:
 - i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - iii. Date of the report and beginning and ending dates of the reporting period;
 - iv. The total operating time of this emissions unit; and
 - v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.
 - c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).

4. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year, in tons/year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation: 0.80 lb OC/hr.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.f. If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emissions Limitation: 19.30 lbs OC/day.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.d. Compliance may be determined based upon the following equation:

$$E_{OC} = \text{summation of } (W_i_{SMC} \times EF).$$

where:

E_{OC} = the daily, OC emissions for all materials, in pounds per day.

W_i_{SMC} = the weight of SMC "i" employed, in pounds per day.

EF = emission factor for styrene emissions from the mold press, which is 0.00134 pounds per pound of mold compound materials, as determined from a Society of Plastics Industry report, "Styrene Emissions during the Charging and Molding Cycle."

- c. Emissions Limitation: 3.52 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the mold compounds, E_{OC} , as specified in section E.1.b. of this permit for the calendar year, divided by 2,000 pounds/ton.

2. Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix

Venture Holdings Corporation

PTI Application: 02-18224

Issued: To be entered upon final issuance

Facility ID: 0204020245

Emissions Unit ID: P007

A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
P007 - Injection mold press no. 3 with a slitter system for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.	OAC rule 3745-31-05	Compliance with the Air Toxic Policy as specified in Section B.III

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1. Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA’s “Air Toxic Policy” was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P008 - Injection mold press no. 4 with a slitter system for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.96 lb/hr, 23.16 lbs/day and 4.23 tons/year. The requirements of this rule also include compliance with the requirement of the daily limit in OAC rule 3745-21-07(G)(2) and the requirements of 40 CFR Parts 63.5780 - 63.5935. See section A.2.a.
	OAC rule 3745-21-07(G)(2)	The hourly and daily emissions limitation specified by this rule are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 63, Subpart WWWW	See section A.2.b. and Part II section A.

2. Additional Terms and Conditions

- 2.a The OC emissions from the molding operations consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) .
- 2.b The following work practice(s) shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and specified in Table 4 of 40 CFR, Part 63, Subpart WWWW:
 - i. only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - ii. mold compound materials may be uncovered before slitting, but must be recovered after slitting.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of production material charges associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize HAP emissions are employed. The inspections shall be performed during representative, normal operating conditions.
2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each sheet mold compound (SMC) employed;
 - b. The weight of each sheet mold compound (SMC) employed, in pounds;
 - c. The weight of all sheet mold compound (SMC) employed, in pounds;
 - d. The total OC emission rate for all materials employed, in pounds;
 - e. The actual number of hours the emissions unit was in operation;
 - f. The average hourly OC emission rate for all materials employed, i.e., (d)/(e), in pounds per hour (average);
 - g. The date and reason any required inspection was not performed; and
 - h. The dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.
3. The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each record. Retention of copies of the semi-annual compliance report(s), required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the production materials exceeded 0.96 pound per hour, and the actual average hourly OC emissions for each such day;
 - b. An identification of each day during which the OC emissions from the production materials exceeded 23.16 pounds per day, and the actual OC emissions for each such day.

2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which include certified statements in the notice of compliance status that state the following:
 - a. only one charge of molding compound was uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - b. mold compound materials were recovered after slitting.

The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date. The initial compliance report must be submitted by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

3. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:
 - a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirements in section A.I.2.b., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.
 - b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:
 - i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - iii. Date of the report and beginning and ending dates of the reporting period;
 - iv. The total operating time of this emissions unit; and
 - v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.
 - c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).

4. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year, in tons/year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation: 0.96 lb OC/hr.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.f. If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emissions Limitation: 23.16 lbs OC/day.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.d. Compliance may be determined based upon the following equation:

$$E_{OC} = \text{summation of } (W_i_{SMC} \times EF).$$

where:

E_{OC} = the daily, OC emissions for all materials, in pounds per day.

W_i_{SMC} = the weight of SMC "i" employed, in pounds per day.

EF = emission factor for styrene emissions from the mold press, which is 0.00134 pounds per pound of mold compound materials, as determined from a Society of Plastics Industry report, "Styrene Emissions during the Charging and Molding Cycle."

- c. Emissions Limitation: 4.23 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the mold compounds, E_{OC} , as specified in section E.1.b. of this permit for the calendar year, divided by 2,000 pounds/ton.

2. Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix

A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
P008 - Injection mold press no. 4 with a slitter system for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.		Compliance with the Air Toxic Policy as specified in Section B.III

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1. Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA’s “Air Toxic Policy” was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

Venture Holdings Corporation

PTI Application: 02-18224

Issued: To be entered upon final issuance

Facility ID: 0204020245

Emissions Unit ID: P008

VI. Miscellaneous Requirements

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P009 - Injection mold press no. 5 with a slitter system for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.21 lbs/hr, 28.94 lbs/day and 5.28 tons/year. The requirements of this rule also include compliance with the requirement of the daily limit in OAC rule 3745-21-07(G)(2) and the requirements of 40 CFR Parts 63.5780 - 63.5935. See section A.2.a.
	OAC rule 3745-21-07(G)(2)	The hourly and daily emissions limitation specified by this rule are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 63, Subpart WWWW	See section A.2.b. and Part II section A.

2. Additional Terms and Conditions

- 2.a The OC emissions from the molding operations consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) .
- 2.b The following work practice(s) shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and specified in Table 4 of 40 CFR, Part 63, Subpart WWWW:
 - i. only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - ii. mold compound materials may be uncovered before slitting, but must be recovered after slitting.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of production material charges associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize HAP emissions are employed. The inspections shall be performed during representative, normal operating conditions.
2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each sheet mold compound (SMC) employed;
 - b. The weight of each sheet mold compound (SMC) employed, in pounds;
 - c. The weight of all sheet mold compound (SMC) employed, in pounds;
 - d. The total OC emission rate for all materials employed, in pounds;
 - e. The actual number of hours the emissions unit was in operation;
 - f. The average hourly OC emission rate for all materials employed, i.e., (d)/(e), in pounds per hour (average);
 - g. The date and reason any required inspection was not performed; and
 - h. The dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.
3. The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each record. Retention of copies of the semi-annual compliance report(s), required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the production materials exceeded 1.21 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. An identification of each day during which the OC emissions from the production materials exceeded 28.94 pounds per day, and the actual OC emissions for each such day.

2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which include certified statements in the notice of compliance status that state the following:
 - a. only one charge of molding compound was uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - b. mold compound materials were recovered after slitting.

The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date. The initial compliance report must be submitted by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

3. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:
 - a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirements in section A.I.2.b., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.
 - b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:
 - i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - iii. Date of the report and beginning and ending dates of the reporting period;
 - iv. The total operating time of this emissions unit; and
 - v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.
 - c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).

4. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year, in tons/year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation: 1.21 lbs OC/hr.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.f. If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emissions Limitation: 28.94 lbs OC/day.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.d. Compliance may be determined based upon the following equation:

$$E_{OC} = \text{summation of } (W_i_{SMC} \times EF).$$

where:

E_{OC} = the daily, OC emissions for all materials, in pounds per day.

W_i_{SMC} = the weight of SMC "i" employed, in pounds per day.

EF = emission factor for styrene emissions from the mold press, which is 0.00134 pounds per pound of mold compound materials, as determined from a Society of Plastics Industry report, "Styrene Emissions during the Charging and Molding Cycle."

- c. Emissions Limitation: 5.28 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the mold compounds, E_{OC} , as specified in section E.1.b. of this permit for the calendar year, divided by 2,000 pounds/ton.

2. Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix

Venture Holdings Corporation

PTI Application: 02-18224

Issued: To be entered upon final issuance

Facility ID: 0204020245

Emissions Unit ID: P009

A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
P009 - Injection mold press no. 5 with a slitter system for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.		Compliance with the Air Toxic Policy as specified in Section B.III

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P010 - Compression mold press no. 6 for reinforced plastic composite parts - administrative modification.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.21 lbs/hr, 28.94 lbs/day and 5.28 tons/year. The requirements of this rule also include compliance with the requirement of the daily limit in OAC rule 3745-21-07(G)(2) and the requirements of 40 CFR Parts 63.5780 - 63.5935. See section A.2.a.
	OAC rule 3745-21-07(G)(2)	The hourly and daily emissions limitation specified by this rule are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 63, Subpart WWWW	See section A.2.b. and Part II section A.

2. Additional Terms and Conditions

- 2.a The OC emissions from the molding operations consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) .
- 2.b The following work practice(s) shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and specified in Table 4 of 40 CFR, Part 63, Subpart WWWW:
 - i. only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - ii. mold compound materials may be uncovered before slitting, but must be recovered after slitting.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of production material charges associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize HAP emissions are employed. The inspections shall be performed during representative, normal operating conditions.
2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each sheet mold compound (SMC) employed;
 - b. The weight of each sheet mold compound (SMC) employed, in pounds;
 - c. The weight of all sheet mold compound (SMC) employed, in pounds;
 - d. The total OC emission rate for all materials employed, in pounds;
 - e. The actual number of hours the emissions unit was in operation;
 - f. The average hourly OC emission rate for all materials employed, i.e., (d)/(e), in pounds per hour (average);
 - g. The date and reason any required inspection was not performed; and
 - h. The dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.
3. The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each record. Retention of copies of the semi-annual compliance report(s), required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the production materials exceeded 1.21 pounds per hour, and the actual average hourly OC emissions for each such day;

- b. An identification of each day during which the OC emissions from the production materials exceeded 28.94 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which include certified statements in the notice of compliance status that state the following: only one charge of molding compound was uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press.

The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date. The initial compliance report must be submitted by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

3. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:
 - a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirements in section A.I.2.b., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.
 - b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:
 - i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - iii. Date of the report and beginning and ending dates of the reporting period;
 - iv. The total operating time of this emissions unit; and
 - v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.
 - c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).
4. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year, in tons/year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation: 1.21 lbs OC/hr.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.f. If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emissions Limitation: 28.94 lbs OC/day.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.d. Compliance may be determined based upon the following equation:

$$E_{OC} = \text{summation of } (W_i_{SMC} \times EF).$$

where:

E_{OC} = the daily, OC emissions for all materials, in pounds per day.

W_i_{SMC} = the weight of SMC "i" employed, in pounds per day.

EF = emission factor for styrene emissions from the mold press, which is 0.00134 pounds per pound of mold compound materials, as determined from a Society of Plastics Industry report, "Styrene Emissions during the Charging and Molding Cycle."

- c. Emissions Limitation: 5.28 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the mold compounds, E_{OC} , as specified in section E.1.b. of this permit for the calendar year, divided by 2,000 pounds/ton.

2. Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
P010 - Compression mold press no. 6 for reinforced plastic composite parts - administrative modification.		Compliance with the Air Toxic Policy as specified in Section B.III

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1. Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA’s “Air Toxic Policy” was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P011 - Compression mold press no. 7 for reinforced plastic composite parts - administrative modification.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.21 lbs/hr, 28.94 lbs/day and 5.28 tons/year. The requirements of this rule also include compliance with the requirement of the daily limit in OAC rule 3745-21-07(G)(2) and the requirements of 40 CFR Parts 63.5780 - 63.5935. See section A.2.a.
	OAC rule 3745-21-07(G)(2)	The hourly and daily emissions limitation specified by this rule are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 63, Subpart WWWW	See section A.2.b. and Part II section A.

2. Additional Terms and Conditions

- 2.a The OC emissions from the molding operations consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) .
- 2.b The following work practice(s) shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and specified in Table 4 of 40 CFR, Part 63, Subpart WWWW:
 - i. only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - ii. mold compound materials may be uncovered before slitting, but must be recovered after slitting.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of production material charges associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize HAP emissions are employed. The inspections shall be performed during representative, normal operating conditions.
2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each sheet mold compound (SMC) employed;
 - b. The weight of each sheet mold compound (SMC) employed, in pounds;
 - c. The weight of all sheet mold compound (SMC) employed, in pounds;
 - d. The total OC emission rate for all materials employed, in pounds;
 - e. The actual number of hours the emissions unit was in operation;
 - f. The average hourly OC emission rate for all materials employed, i.e., (d)/(e), in pounds per hour (average);
 - g. The date and reason any required inspection was not performed; and
 - h. The dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.
3. The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each record. Retention of copies of the semi-annual compliance report(s), required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the production materials exceeded 1.21 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. An identification of each day during which the OC emissions from the production materials exceeded 28.94 pounds per day, and the actual OC emissions for each such day.

2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which include certified statements in the notice of compliance status that state the following:
 - a. only one charge of molding compound was uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - b. mold compound materials were recovered after slitting.

The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date. The initial compliance report must be submitted by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

3. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:
 - a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirements in section A.I.2.b., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.
 - b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:
 - i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - iii. Date of the report and beginning and ending dates of the reporting period;
 - iv. The total operating time of this emissions unit; and
 - v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.
 - c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).

4. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year, in tons/year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation: 1.21 lbs OC/hr.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.f. If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emissions Limitation: 28.94 lbs OC/day.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.d. Compliance may be determined based upon the following equation:

$$E_{OC} = \text{summation of } (W_i_{SMC} \times EF).$$

where:

E_{OC} = the daily, OC emissions for all materials, in pounds per day.

W_i_{SMC} = the weight of SMC "i" employed, in pounds per day.

EF = emission factor for styrene emissions from the mold press, which is 0.00134 pounds per pound of mold compound materials, as determined from a Society of Plastics Industry report, "Styrene Emissions during the Charging and Molding Cycle."

- c. Emissions Limitation: 5.28 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the mold compounds, E_{OC} , as specified in section E.1.b. of this permit for the calendar year, divided by 2,000 pounds/ton.

2. Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix

A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
P011 - Compression mold press no. 7 for reinforced plastic composite parts - administrative modification.		Compliance with the Air Toxic Policy as specified in Section B.III

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1. Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA’s “Air Toxic Policy” was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P013 - Injection mold press no. 9 with a slitter system for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.80 lb/hr, 19.30 lbs/day and 3.52 tons/year. The requirements of this rule also include compliance with the requirement of the daily limit in OAC rule 3745-21-07(G)(2) and the requirements of 40 CFR Parts 63.5780 - 63.5935. See section A.2.a.
	OAC rule 3745-21-07(G)(2)	The hourly and daily emissions limitation specified by this rule are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 63, Subpart WWWW	See section A.2.b. and Part II section A.

2. Additional Terms and Conditions

- 2.a The OC emissions from the molding operations consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) .
- 2.b The following work practice(s) shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and specified in Table 4 of 40 CFR, Part 63, Subpart WWWW:
 - i. only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - ii. mold compound materials may be uncovered before slitting, but must be recovered after slitting.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of production material charges associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize HAP emissions are employed. The inspections shall be performed during representative, normal operating conditions.
2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each sheet mold compound (SMC) employed;
 - b. The weight of each sheet mold compound (SMC) employed, in pounds;
 - c. The weight of all sheet mold compound (SMC) employed, in pounds;
 - d. The total OC emission rate for all materials employed, in pounds;
 - e. The actual number of hours the emissions unit was in operation;
 - f. The average hourly OC emission rate for all materials employed, i.e., (d)/(e), in pounds per hour (average);
 - g. The date and reason any required inspection was not performed; and
 - h. The dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.
3. The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each record. Retention of copies of the semi-annual compliance report(s), required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the production materials exceeded 0.80 pound per hour, and the actual average hourly OC emissions for each such day;
 - b. An identification of each day during which the OC emissions from the production materials exceeded 19.30 pounds per day, and the actual OC emissions for each such day.

2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which include certified statements in the notice of compliance status that state the following:
 - a. only one charge of molding compound was uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - b. mold compound materials were recovered after slitting.

The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date. The initial compliance report must be submitted by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

3. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:
 - a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirements in section A.I.2.b., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.
 - b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:
 - i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - iii. Date of the report and beginning and ending dates of the reporting period;
 - iv. The total operating time of this emissions unit; and
 - v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.
 - c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).

4. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year, in tons/year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation: 0.80 lb OC/hr.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.f. If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emissions Limitation: 19.30 lbs OC/day.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.d. Compliance may be determined based upon the following equation:

$$E_{OC} = \text{summation of } (W_i_{SMC} \times EF).$$

where:

E_{OC} = the daily, OC emissions for all materials, in pounds per day.

W_i_{SMC} = the weight of SMC "i" employed, in pounds per day.

EF = emission factor for styrene emissions from the mold press, which is 0.00134 pounds per pound of mold compound materials, as determined from a Society of Plastics Industry report, "Styrene Emissions during the Charging and Molding Cycle."

- c. Emissions Limitation: 3.52 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the mold compounds, E_{OC} , as specified in section E.1.b. of this permit for the calendar year, divided by 2,000 pounds/ton.

2. Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix

Venture Holdings Corporation

PTI Application: 02-18224

Issued: To be entered upon final issuance

Facility ID: 0204020245

Emissions Unit ID: P013

A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
P013 - Injection mold press no. 9 with a slitter system for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.		Compliance with the Air Toxic Policy as specified in Section B.III

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1. Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA’s “Air Toxic Policy” was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P014 - Injection mold press no. 10 with a slitter for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.29 lbs/hr, 30.87 lbs/day and 5.63 tons/year. The requirements of this rule also include compliance with the requirement of the daily limit in OAC rule 3745-21-07(G)(2) and the requirements of 40 CFR Parts 63.5780 - 63.5935. See section A.2.a.
	OAC rule 3745-21-07(G)(2)	The hourly and daily emissions limitation specified by this rule are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 63, Subpart WWWW	See section A.2.b. and Part II section A.

2. Additional Terms and Conditions

- 2.a The OC emissions from the molding operations consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) .
- 2.b The following work practice(s) shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and specified in Table 4 of 40 CFR, Part 63, Subpart WWWW:
 - i. only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - ii. mold compound materials may be uncovered before slitting, but must be recovered after slitting.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of production material charges associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize HAP emissions are employed. The inspections shall be performed during representative, normal operating conditions.
2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each sheet mold compound (SMC) employed;
 - b. The weight of each sheet mold compound (SMC) employed, in pounds;
 - c. The weight of all sheet mold compound (SMC) employed, in pounds;
 - d. The total OC emission rate for all materials employed, in pounds;
 - e. The actual number of hours the emissions unit was in operation;
 - f. The average hourly OC emission rate for all materials employed, i.e., (d)/(e), in pounds per hour (average);
 - g. The date and reason any required inspection was not performed; and
 - h. The dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.
3. The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each record. Retention of copies of the semi-annual compliance report(s), required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the production materials exceeded 1.29 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. An identification of each day during which the OC emissions from the production materials exceeded 30.87 pounds per day, and the actual OC emissions for each such day.

2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which include certified statements in the notice of compliance status that state the following:
 - a. only one charge of molding compound was uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - b. mold compound materials were recovered after slitting.

The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date. The initial compliance report must be submitted by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

3. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:
 - a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirements in section A.I.2.b., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.
 - b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:
 - i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - iii. Date of the report and beginning and ending dates of the reporting period;
 - iv. The total operating time of this emissions unit; and
 - v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.
 - c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).

4. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year, in tons/year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation: 1.29 lbs OC/hr.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.f. If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emissions Limitation: 30.87 lbs OC/day.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.d. Compliance may be determined based upon the following equation:

$$E_{OC} = \text{summation of } (W_i_{SMC} \times EF).$$

where:

E_{OC} = the daily, OC emissions for all materials, in pounds per day.

W_i_{SMC} = the weight of SMC "i" employed, in pounds per day.

EF = emission factor for styrene emissions from the mold press, which is 0.00134 pounds per pound of mold compound materials, as determined from a Society of Plastics Industry report, "Styrene Emissions during the Charging and Molding Cycle."

- c. Emissions Limitation: 5.63 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the mold compounds, E_{OC} , as specified in section E.1.b. of this permit for the calendar year, divided by 2,000 pounds/ton.

2. Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix

A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
P014 - Injection mold press no. 10 with a slitter for reinforced plastic composite parts - chapter 31 modification of PTI02-12229		Compliance with the Air Toxic Policy as specified in Section B.III

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1. Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA’s “Air Toxic Policy” was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P016 - Injection mold press no. 12 with a slitter system for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.21 lbs/hr, 28.94 lbs/day and 5.28 tons/year. The requirements of this rule also include compliance with the requirement of the daily limit in OAC rule 3745-21-07(G)(2) and the requirements of 40 CFR Parts 63.5780 - 63.5935. See section A.2.a.
	OAC rule 3745-21-07(G)(2)	The hourly and daily emissions limitation specified by this rule are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 63, Subpart WWWW	See section A.2.b. and Part II section A.

2. Additional Terms and Conditions

- 2.a The OC emissions from the molding operations consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) .
- 2.b The following work practice(s) shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and specified in Table 4 of 40 CFR, Part 63, Subpart WWWW:
 - i. only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - ii. mold compound materials may be uncovered before slitting, but must be recovered after slitting.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of production material charges associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize HAP emissions are employed. The inspections shall be performed during representative, normal operating conditions.
2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each sheet mold compound (SMC) employed;
 - b. The weight of each sheet mold compound (SMC) employed, in pounds;
 - c. The weight of all sheet mold compound (SMC) employed, in pounds;
 - d. The total OC emission rate for all materials employed, in pounds;
 - e. The actual number of hours the emissions unit was in operation;
 - f. The average hourly OC emission rate for all materials employed, i.e., (d)/(e), in pounds per hour (average);
 - g. The date and reason any required inspection was not performed; and
 - h. The dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.
3. The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each record. Retention of copies of the semi-annual compliance report(s), required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the production materials exceeded 1.21 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. An identification of each day during which the OC emissions from the production materials exceeded 28.94 pounds per day, and the actual OC emissions for each such day.

2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which include certified statements in the notice of compliance status that state the following:
 - a. only one charge of molding compound was uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - b. mold compound materials were recovered after slitting.

The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date. The initial compliance report must be submitted by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

3. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:
 - a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirements in section A.I.2.b., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.
 - b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:
 - i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - iii. Date of the report and beginning and ending dates of the reporting period;
 - iv. The total operating time of this emissions unit; and
 - v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.
 - c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).

4. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year, in tons/year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation: 1.21 lbs OC/hr.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.f. If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emissions Limitation: 28.94 lbs OC/day.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.d. Compliance may be determined based upon the following equation:

$$E_{OC} = \text{summation of } (W_i_{SMC} \times EF).$$

where:

E_{OC} = the daily, OC emissions for all materials, in pounds per day.

W_i_{SMC} = the weight of SMC "i" employed, in pounds per day.

EF = emission factor for styrene emissions from the mold press, which is 0.00134 pounds per pound of mold compound materials, as determined from a Society of Plastics Industry report, "Styrene Emissions during the Charging and Molding Cycle."

- c. Emissions Limitation: 5.28 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the mold compounds, E_{OC} , as specified in section E.1.b. of this permit for the calendar year, divided by 2,000 pounds/ton.

2. Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix

A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
P016 - Injection mold press no. 12 with a slitter system for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.		Compliance with the Air Toxic Policy as specified in Section B.III

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1. Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA’s “Air Toxic Policy” was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P017 - Injection mold press no. 13 with a slitter for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.21 lbs/hr, 28.94 lbs/day and 5.28 tons/year. The requirements of this rule also include compliance with the requirement of the daily limit in OAC rule 3745-21-07(G)(2) and the requirements of 40 CFR Parts 63.5780 - 63.5935. See section A.2.a.
	OAC rule 3745-21-07(G)(2)	The hourly and daily emissions limitation specified by this rule are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 63, Subpart WWWW	See section A.2.b. and Part II section A.

2. Additional Terms and Conditions

- 2.a The OC emissions from the molding operations consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) .
- 2.b The following work practice(s) shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and specified in Table 4 of 40 CFR, Part 63, Subpart WWWW:
 - i. only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - ii. mold compound materials may be uncovered before slitting, but must be recovered after slitting.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of production material charges associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize HAP emissions are employed. The inspections shall be performed during representative, normal operating conditions.
2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each sheet mold compound (SMC) employed;
 - b. The weight of each sheet mold compound (SMC) employed, in pounds;
 - c. The weight of all sheet mold compound (SMC) employed, in pounds;
 - d. The total OC emission rate for all materials employed, in pounds;
 - e. The actual number of hours the emissions unit was in operation;
 - f. The average hourly OC emission rate for all materials employed, i.e., (d)/(e), in pounds per hour (average);
 - g. The date and reason any required inspection was not performed; and
 - h. The dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.
3. The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each record. Retention of copies of the semi-annual compliance report(s), required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the production materials exceeded 1.21 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. An identification of each day during which the OC emissions from the production materials exceeded 28.94 pounds per day, and the actual OC emissions for each such day.

2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which include certified statements in the notice of compliance status that state the following:
 - a. only one charge of molding compound was uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - b. mold compound materials were recovered after slitting.

The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date. The initial compliance report must be submitted by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

3. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:
 - a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirements in section A.I.2.b., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.
 - b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:
 - i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - iii. Date of the report and beginning and ending dates of the reporting period;
 - iv. The total operating time of this emissions unit; and
 - v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.
 - c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).

4. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year, in tons/year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation: 1.21 lbs OC/hr.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.f. If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emissions Limitation: 28.94 lbs OC/day.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.d. Compliance may be determined based upon the following equation:

$$E_{OC} = \text{summation of } (W_i_{SMC} \times EF).$$

where:

E_{OC} = the daily, OC emissions for all materials, in pounds per day.

W_i_{SMC} = the weight of SMC "i" employed, in pounds per day.

EF = emission factor for styrene emissions from the mold press, which is 0.00134 pounds per pound of mold compound materials, as determined from a Society of Plastics Industry report, "Styrene Emissions during the Charging and Molding Cycle."

- c. Emissions Limitation: 5.28 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the mold compounds, E_{OC} , as specified in section E.1.b. of this permit for the calendar year, divided by 2,000 pounds/ton.

2. Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix

Venture Holdings Corporation

PTI Application: 02-18224

Issued: To be entered upon final issuance

Facility ID: 0204020245

Emissions Unit ID: P017

A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
P017 - Injection mold press no. 13 with a slitter for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.		Compliance with the Air Toxic Policy as specified in Section B.III

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1. Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA’s “Air Toxic Policy” was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P018 - Injection mold press no. 14 with a slitter system for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.29 lbs/hr, 30.87 lbs/day and 5.63 tons/year. The requirements of this rule also include compliance with the requirement of the daily limit in OAC rule 3745-21-07(G)(2) and the requirements of 40 CFR Parts 63.5780 - 63.5935. See section A.2.a.
	OAC rule 3745-21-07(G)(2)	The hourly and daily emissions limitation specified by this rule are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 63, Subpart WWWW	See section A.2.b. and Part II section A.

2. Additional Terms and Conditions

- 2.a The OC emissions from the molding operations consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) .
- 2.b The following work practice(s) shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and specified in Table 4 of 40 CFR, Part 63, Subpart WWWW:
 - i. only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - ii. mold compound materials may be uncovered before slitting, but must be recovered after slitting.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of production material charges associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize HAP emissions are employed. The inspections shall be performed during representative, normal operating conditions.
2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each sheet mold compound (SMC) employed;
 - b. The weight of each sheet mold compound (SMC) employed, in pounds;
 - c. The weight of all sheet mold compound (SMC) employed, in pounds;
 - d. The total OC emission rate for all materials employed, in pounds;
 - e. The actual number of hours the emissions unit was in operation;
 - f. The average hourly OC emission rate for all materials employed, i.e., (d)/(e), in pounds per hour (average);
 - g. The date and reason any required inspection was not performed; and
 - h. The dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.
3. The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each record. Retention of copies of the semi-annual compliance report(s), required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the production materials exceeded 1.29 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. An identification of each day during which the OC emissions from the production materials exceeded 30.87 pounds per day, and the actual OC emissions for each such day.

2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which include certified statements in the notice of compliance status that state the following:
 - a. only one charge of molding compound was uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - b. mold compound materials were recovered after slitting.

The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date. The initial compliance report must be submitted by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

3. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:
 - a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirements in section A.I.2.b., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.
 - b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:
 - i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - iii. Date of the report and beginning and ending dates of the reporting period;
 - iv. The total operating time of this emissions unit; and
 - v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.
 - c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).

4. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year, in tons/year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation: 1.29 lbs OC/hr.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.f. If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emissions Limitation: 30.87 lbs OC/day.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.d. Compliance may be determined based upon the following equation:

$$E_{OC} = \text{summation of } (W_i_{SMC} \times EF).$$

where:

E_{OC} = the daily, OC emissions for all materials, in pounds per day.

W_i_{SMC} = the weight of SMC "i" employed, in pounds per day.

EF = emission factor for styrene emissions from the mold press, which is 0.00134 pounds per pound of mold compound materials, as determined from a Society of Plastics Industry report, "Styrene Emissions during the Charging and Molding Cycle."

- c. Emissions Limitation: 5.63 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the mold compounds, E_{OC} , as specified in section E.1.b. of this permit for the calendar year, divided by 2,000 pounds/ton.

2. Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix

A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
P018 - Injection mold press no. 14 with a slitter system for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.		Compliance with the Air Toxic Policy as specified in Section B.III

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1. Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA’s “Air Toxic Policy” was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P019 - Injection mold press no. 15 with a slitter system for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.21 lbs/hr, 28.94 lbs/day and 5.28 tons/year. The requirements of this rule also include compliance with the requirement of the daily limit in OAC rule 3745-21-07(G)(2) and the requirements of 40 CFR Parts 63.5780 - 63.5935. See section A.2.a.
	OAC rule 3745-21-07(G)(2)	The hourly and daily emissions limitation specified by this rule are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 63, Subpart WWWW	See section A.2.b. and Part II section A.

2. Additional Terms and Conditions

- 2.a The OC emissions from the molding operations consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) .
- 2.b The following work practice(s) shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and specified in Table 4 of 40 CFR, Part 63, Subpart WWWW:
 - i. only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - ii. mold compound materials may be uncovered before slitting, but must be recovered after slitting.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of production material charges associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize HAP emissions are employed. The inspections shall be performed during representative, normal operating conditions.
2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each sheet mold compound (SMC) employed;
 - b. The weight of each sheet mold compound (SMC) employed, in pounds;
 - c. The weight of all sheet mold compound (SMC) employed, in pounds;
 - d. The total OC emission rate for all materials employed, in pounds;
 - e. The actual number of hours the emissions unit was in operation;
 - f. The average hourly OC emission rate for all materials employed, i.e., (d)/(e), in pounds per hour (average);
 - g. The date and reason any required inspection was not performed; and
 - h. The dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.
3. The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each record. Retention of copies of the semi-annual compliance report(s), required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the production materials exceeded 1.21 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. An identification of each day during which the OC emissions from the production materials exceeded 28.94 pounds per day, and the actual OC emissions for each such day.

2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which include certified statements in the notice of compliance status that state the following:
 - a. only one charge of molding compound was uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - b. mold compound materials were recovered after slitting.

The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date. The initial compliance report must be submitted by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

3. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:
 - a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirements in section A.I.2.b., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.
 - b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:
 - i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - iii. Date of the report and beginning and ending dates of the reporting period;
 - iv. The total operating time of this emissions unit; and
 - v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.
 - c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).

4. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year, in tons/year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation: 1.21 lbs OC/hr.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.f. If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emissions Limitation: 28.94 lbs OC/day.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.d. Compliance may be determined based upon the following equation:

$$E_{OC} = \text{summation of } (W_i_{SMC} \times EF).$$

where:

E_{OC} = the daily, OC emissions for all materials, in pounds per day.

W_i_{SMC} = the weight of SMC "i" employed, in pounds per day.

EF = emission factor for styrene emissions from the mold press, which is 0.00134 pounds per pound of mold compound materials, as determined from a Society of Plastics Industry report, "Styrene Emissions during the Charging and Molding Cycle."

- c. Emissions Limitation: 5.28 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the mold compounds, E_{OC} , as specified in section E.1.b. of this permit for the calendar year, divided by 2,000 pounds/ton.

2. Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix

Venture Holdings Corporation

PTI Application: 02-18224

Issued: To be entered upon final issuance

Facility ID: 0204020245

Emissions Unit ID: P019

A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
P019 - Injection mold press no. 15 with a slitter system for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.		Compliance with the Air Toxic Policy as specified in Section B.III

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1. Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA’s “Air Toxic Policy” was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P020 - Compression mold press no. 16 for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.21 lbs/hr, 28.94 lbs/day and 5.28 tons/year. The requirements of this rule also include compliance with the requirement of the daily limit in OAC rule 3745-21-07(G)(2) and the requirements of 40 CFR Parts 63.5780 - 63.5935. See section A.2.a.
	OAC rule 3745-21-07(G)(2)	The hourly and daily emissions limitation specified by this rule are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 63, Subpart WWWW	See section A.2.b. and Part II section A.

2. **Additional Terms and Conditions**

- 2.a The OC emissions from the molding operations consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) .
- 2.b The following work practice(s) shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and specified in Table 4 of 40 CFR, Part 63, Subpart WWWW: only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of production material charges associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize HAP emissions are employed. The inspections shall be performed during representative, normal operating conditions.
2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each sheet mold compound (SMC) employed;
 - b. The weight of each sheet mold compound (SMC) employed, in pounds;
 - c. The weight of all sheet mold compound (SMC) employed, in pounds;
 - d. The total OC emission rate for all materials employed, in pounds;
 - e. The actual number of hours the emissions unit was in operation;
 - f. The average hourly OC emission rate for all materials employed, i.e., (d)/(e), in pounds per hour (average);
 - g. The date and reason any required inspection was not performed; and
 - h. The dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.
3. The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each record. Retention of copies of the semi-annual compliance report(s), required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the production materials exceeded 1.21 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. An identification of each day during which the OC emissions from the production materials exceeded 28.94 pounds per day, and the actual OC emissions for each such day.

2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which include certified statements in the notice of compliance status that state the following: only one charge of molding compound was uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press.

The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date. The initial compliance report must be submitted by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

3. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:
 - a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirements in section A.I.2.b., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.
 - b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:
 - i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - iii. Date of the report and beginning and ending dates of the reporting period;
 - iv. The total operating time of this emissions unit; and
 - v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.
 - c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).
4. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year, in tons/year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation: 1.21 lbs OC/hr.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.f. If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emissions Limitation: 28.94 lbs OC/day.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.d. Compliance may be determined based upon the following equation:

$$E_{OC} = \text{summation of } (W_i_{SMC} \times EF).$$

where:

E_{OC} = the daily, OC emissions for all materials, in pounds per day.

W_i_{SMC} = the weight of SMC "i" employed, in pounds per day.

EF = emission factor for styrene emissions from the mold press, which is 0.00134 pounds per pound of mold compound materials, as determined from a Society of Plastics Industry report, "Styrene Emissions during the Charging and Molding Cycle."

- c. Emissions Limitation: 5.28 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the mold compounds, E_{OC} , as specified in section E.1.b. of this permit for the calendar year, divided by 2,000 pounds/ton.

2. Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).

Venture Holdings Corporation

PTI Application: 02-18224

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Facility ID: 0204020245

Emissions Unit ID: P020

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
P020 - Compression mold press no. 16 for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.		Compliance with the Air Toxic Policy as specified in Section B.III

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1. Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA’s “Air Toxic Policy” was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P021 - Compressions mold press no. 17 for reinforced plastic composite parts -chapter 31 modification of PTI 02-12229, issued on December 18, 2001.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.21 lbs/hr, 28.94 lbs/day and 5.28 tons/year. The requirements of this rule also include compliance with the requirement of the daily limit in OAC rule 3745-21-07(G)(2) and the requirements of 40 CFR Parts 63.5780 - 63.5935. See section A.2.a.
	OAC rule 3745-21-07(G)(2)	The hourly and daily emissions limitation specified by this rule are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 63, Subpart WWWW	See section A.2.b. and Part II section A.

2. **Additional Terms and Conditions**

- 2.a The OC emissions from the molding operations consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) .
- 2.b The following work practice(s) shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and specified in Table 4 of 40 CFR, Part 63, Subpart WWWW: only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of production material charges associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize HAP emissions are employed. The inspections shall be performed during representative, normal operating conditions.
2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each sheet mold compound (SMC) employed;
 - b. The weight of each sheet mold compound (SMC) employed, in pounds;
 - c. The weight of all sheet mold compound (SMC) employed, in pounds;
 - d. The total OC emission rate for all materials employed, in pounds;
 - e. The actual number of hours the emissions unit was in operation;
 - f. The average hourly OC emission rate for all materials employed, i.e., (d)/(e), in pounds per hour (average);
 - g. The date and reason any required inspection was not performed; and
 - h. The dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.
3. The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each record. Retention of copies of the semi-annual compliance report(s), required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the production materials exceeded 1.21 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. An identification of each day during which the OC emissions from the production materials exceeded 28.94 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which include certified statements in the notice of compliance status that state the following: only one charge of molding compound was uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press.

The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date. The initial compliance report must be submitted by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

3. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:
 - a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirements in section A.I.2.b., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.
 - b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:
 - i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - iii. Date of the report and beginning and ending dates of the reporting period;
 - iv. The total operating time of this emissions unit; and
 - v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.
 - c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).
4. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year, in tons/year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation: 1.21 lb OC/hr.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.f. If required, the permittee shall

demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emissions Limitation: 28.94 lbs OC/day.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.d. Compliance may be determined based upon the following equation:

$$E_{OC} = \text{summation of } (W_{i_SMC} \times EF).$$

where:

E_{OC} = the daily, OC emissions for all materials, in pounds per day.

W_{i_SMC} = the weight of SMC "i" employed, in pounds per day.

EF = emission factor for styrene emissions from the mold press, which is 0.00134 pounds per pound of mold compound materials, as determined from a Society of Plastics Industry report, "Styrene Emissions during the Charging and Molding Cycle."

- c. Emissions Limitation: 5.28 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the mold compounds, E_{OC} , as specified in section E.1.b. of this permit for the calendar year, divided by 2,000 pounds/ton.

2. Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).

VI. Miscellaneous Requirements

Venture Holdings Corporation

PTI Application: 02-18224

Issued: To be entered upon final issuance

Facility ID: 0204020245

Emissions Unit ID: P021

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
P021 - Compressions mold press no. 17 for reinforced plastic composite parts -chapter 31 modification of PTI 02-12229, issued on December 18, 2001.		Compliance with the Air Toxic Policy a specified in Section B.III.1.

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1. Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA’s “Air Toxic Policy” was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P022 - Compression mold press no. 18 for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.74 lbs/hr and 7.63 tons/year. The requirements of this rule also include compliance with the requirements of 40 CFR Parts 63.5780 - 63.5935. 40 CFR Parts 63.5780 - 63.5935. See section A.I.2.a.
	OAC rule 3745-21-07(G)(2)	The hourly emissions limit based on this applicable rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3). See section A.I.2.b.
	OAC rule 3745-21-07(G)(9)(g)	OC emissions shall not exceed 41.81 lbs/day from production operations. See section A.II.1.
	40 CFR, Part 63, Subpart WWWW	See section A.2.c. and Part II section A.

2. Additional Terms and Conditions

- 2.a The OC emissions from the production operations consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) .
- 2.b This emissions unit is exempt from the daily OC emissions limitation specified in OAC rule 3745-21-07(G)(2) because it meets the requirements specified in OAC rule 3745-21-07(G)(9)(g).
- 2.c The following work practice(s) shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and specified

in Table 4 of 40 CFR, Part 63, Subpart WWWW: only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press.

II. Operational Restrictions

1. The volatile organic compound (VOC) content of each mold compound shall be no more than 17% (by weight), as applied.
- b. The use of cleanup solvents, containing OC materials, is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of production material charges associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize HAP emissions are employed. The inspections shall be performed during representative, normal operating conditions.
2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each sheet mold compound (SMC) employed;
 - b. The weight of each sheet mold compound (SMC) employed, in pounds;
 - c. The VOC content of each mold compound, as applied, in percent by weight;
 - d. The weight of all sheet mold compound (SMC) employed, in pounds;
 - e. The total OC emission rate for all materials employed, in pounds;
 - f. The actual number of hours the emissions unit was in operation;
 - g. The average hourly OC emission rate for all materials employed, i.e., (e)/(f), in pounds per hour (average);
 - h. The date and reason any required inspection was not performed; and
 - i. The dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.
3. The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each record. Retention of copies of the semi-annual compliance report(s), required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the production materials exceeded 1.74 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. An identification of each day during which the OC emissions from the production materials exceeded 41.81 pounds per day, and the actual OC emissions for each such day; and
 - c. An identification of each day during which the VOC content of any mold compound exceeded 17% (by weight), as applied.
2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which include certified statements in the notice of compliance status that state that only one charge of molding compound was uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press.

The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date. The initial compliance report must be submitted by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

3. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:
 - a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirement in section A.I.2.c., and if there were no deviations from the record keeping requirements in section A.III.2.i., a statement that there were no deviations during the reporting period.
 - b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:
 - i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - iii. Date of the report and beginning and ending dates of the reporting period;
 - iv. The total operating time of this emissions unit; and

- v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.
- c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).
- 4. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year, in tons/year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

- 1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation: 1.74 lbs OC/hr.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.g. If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emissions Limitation: 41.81 lbs OC/day.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.e. Compliance may be determined based upon the following equation:

$$E_{OC} = (\text{summation of } W_{i_SMC}) \times EF.$$

where:

E_{OC} = the daily, OC emissions for all materials, in pounds per day.

W_{i_SMC} = the weight of SMC "i" employed, in pounds per day.

EF = emission factor for styrene emissions from the mold press, which is 0.00134 pounds per pound of mold compound materials, as determined from a Society of Plastics Industry report, "Styrene Emissions during the Charging and Molding Cycle."

- c. Emissions Limitation: 7.63 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the mold compounds, E_{OC} , as specified in section E.1.b. of this permit for the calendar year, and shall be divided by 2,000 pounds/ton.

2. Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
P022 - Compression mold press no. 18 for reinforced plastic composite parts - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.	OAC rule 3745-31-05	Compliance with the Air Toxic Policy as specified in Section B.III.1.

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1. Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA’s “Air Toxic Policy” was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P025 - Jayco mixer 2 for polyester resin/styrene paste production with a baghouse (JAYCODC) to control particulate emissions - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.	OAC rule 3745-31-05(A)(3)	Visible particulate emissions (PE) shall not exceed 5% opacity as a 6-minute average. The PE rate shall not exceed 0.52 lb/hr and 2.28 tons/year. Organic compound (OC) emissions shall not exceed 1.49 lbs/hr and 35.8 lbs/day from production operations. OC emissions shall not exceed 261.1 lbs/week from cleanup/purge operations. OC emissions shall not exceed 13.3 tons/year from production operations and from cleanup/purge operations. The requirements of this rule also include compliance with the requirements of 40 CFR Parts 63.5780 - 63.5935. See sections A.I.2.a. and A.II.1.
	OAC 3745-17-07(A)(1) OAC 3745-17-11 OAC rule 3745-21-07(G)(2)	The requirements of these rules are less stringent than the requirements of OAC rule 3745-31-05(A)(3).
	40 CFR, Part 63, Subpart WWWW	See section A.2.b. and Part II section A.

2. Additional Terms and Conditions

- 2.a The OC emissions from the production operations consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) .
- 2.b The following work practice(s) shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and specified in Table 4 of 40 CFR, Part 63, Subpart WWWW:

- i.** use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;
- ii.** keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels; and
- iii.** the use of HAP containing cleaning solvents is prohibited, except that styrene may be used as a cleaner in closed systems.

II. Operational Restrictions

1. The use of photochemically reactive cleanup/purge materials is prohibited for open cleanup/purge operations.
2. The pressure drop across the baghouse shall be maintained within the range recommended by the manufacturer while the emissions unit is in operation or within a range established during the most recent performance test that demonstrated that the emissions unit was in compliance.

III. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of production operations and cleanup operations associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize HAP emissions are employed. The inspections shall be performed during representative, normal operating conditions.
2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each resin/styrene paste material produced;
 - b. the weight of each polyester resin/styrene paste material produced, in pounds per day;
 - c. the total OC content of each polyester resin/styrene paste material produced, in percent by weight;
 - d. the total OC emissions rate for all polyester resin/styrene paste materials, in pounds per day;
 - e. the actual number of hours that the emissions unit was in operation;
 - f. the average hourly OC emissions rate for all polyester resin/styrene paste materials, i.e., (d) divided by (e), in pounds per hour (average);
 - g. the date and reason any required inspection was not performed; and
 - h. the dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.

3. The permittee shall collect and record the following information for each week for this emissions unit:
 - a. the company identification of each cleanup/purge material employed;
 - b. the total volume of each cleanup/purge material applied, in gallons;
 - c. the OC content of each cleanup/purge material applied, in pound per gallon;
 - d. if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports, records of the total amount (gallons) of cleanup and purge material collected from this emissions unit and added to the recovery tank/drum, for recycle/recovery and/or disposal at an outside facility, shall be maintained as required in Section A.III.3.;
 - e. if a credit for recovered cleanup/purge material is used, the volume of this material added to the recovery tank/drum, in gallons per week;
 - f. if a credit for recovered materials is used, the adjusted volume of cleanup/purge materials employed, calculate by subtracting the volume of the recovered cleanup/purge material added to the recovery tank/drum (d), from the volume of the total cleanup/purge material applied (b), in gallons per week; and
 - g. the total OC emissions rate for all cleanup/purge materials, in pounds per week.
4. If a credit for recovered materials from this emissions unit is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup and purge materials, and the recovery drum or tank serving this emissions unit:
 - a. the date the materials from the recovery drum or tank were shipped off site; and
 - b. the number of gallons of materials from the recovery drum or tank shipped off site
5. The permittee shall maintain information to document that each cleanup/purge material applied in this emissions unit is non-photochemically reactive.
6. The permittee shall maintain information to document the composition of each polyester resin/styrene paste material produced.
7. The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each record. Retention of copies of the semi-annual compliance report(s), required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.
8. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be

installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

IV. Reporting Requirements

- 1.** The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly OC emissions from the production operations exceeded 1.49 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. an identification of each day during which the OC emissions from the production operations exceeded 35.8 pounds per day, and the actual OC emissions for each such day;
 - c. an identification of each week during which the OC emissions from the cleanup/purge operations exceeded 261.1 pounds per week, and the actual OC emissions for each such week;
 - d. an identification of each day during which any photochemically reactive cleanup/purge materials were employed; and
 - e. an identification of each day during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.2.

- 2.** The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which include certified statements in the notice of compliance status that state the following:
 - a. use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;
 - b. keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels; and
 - c. no HAP containing cleaning solvents were used, except that styrene may be used as a cleaner in closed systems.

The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date. The initial compliance report must be submitted by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

- 3.** The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:

- a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirements in section A.I.2.b., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.
 - b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:
 - i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - iii. Date of the report and beginning and ending dates of the reporting period;
 - iv. The total operating time of this emissions unit; and
 - v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.
 - c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).
- 4.** The permittee shall submit annual reports which specify the total OC emissions and the total PE rate from this emissions unit for the previous calendar year. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 of each year.

V. Testing Requirements

- 1.** Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 5% opacity of visible PE, as a 6-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, and the procedures specified in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation: 0.52 lb PE/hr.

Applicable Compliance Method(s): To determine the actual worst case emission rate for particulate matter, the following equation may be used:

$$E_{PE} = P \times EF \times (1 - CE/100).$$

Where the following applies:

E_{PE} = PE, in pounds per hour.

P = maximum dry solids throughput rate, which is 7276 pounds per hour as noted in the permit application.

EF = emission factor for uncontrolled PE, which is 0.00333 pounds of uncontrolled PE per pound of dry solids processed for a closed mixer, according to engineering estimates as noted in the application for PTI 02-18224.

CE = control efficiency of the PE control device, in percent which is 99 as noted in the permit application.

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

- c. Emission Limitation: 2.28 TPY PE.

Applicable Compliance Method: To determine the annual rate for PE, the worst case, hourly emission rate as determined in section A.V.1.b. shall be multiplied by the actual hours of operation, as specified in the record keeping requirements of section A.III.2.e., and divided by 2000 lbs/ton.

- d. Emissions Limitation: 1.49 lbs OC/hr from production operations.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.f. If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- e. Emissions Limitation: 35.8 lbs OC/day from production operations.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.d. Compliance may be determined based upon the following equation:

$$EP_{OC} = \text{summation of } [W_i \times OC_i \times EF(OC)].$$

where:

EP_{OC} = OC emissions as styrene from the polyester resin/styrene paste mix production operations, in pounds per day.

W_i = the weight of resin paste mix "i" produced, in pounds per day.

OC_i = the styrene content of resin paste mix "i", in percent by weight.

EF(OC) = the styrene emissions factor, which is 0.000287 pound of styrene emissions per pound of available styrene content, as determined from results of a U.S. EPA Method 25A test, conducted on September 27, 2001.

- f. Emission Limitation: 261.1 lbs OC/week from cleanup/purge operations.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.3.g. Compliance may be determined based upon the following equation:

$EC(OC) = \text{summation of } (V_i \times OC_i)$.

where:

EC(OC) = OC emissions from the cleanup/purge operations, in pounds per week.

V_i = the volume of cleanup/purge material applied, from Sections A.III.3.b. or A.III.3.f., in gallons per week.

OC_i = the OC content of cleanup/purge material "i", in per pounds per gallon.

- g. Emissions Limitation: 13.3 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the production operations, EP_OC, added to the sum of the daily OC emissions rates from the cleanup/purge operations, EC_OC, as specified in section E.1.e. and E.1.f., respectively, of this permit for the calendar year, divided by 2,000 pounds/ton.

2. Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
P025 - Jayco mixer 2 for polyester resin/styrene paste production with a baghouse (JAYCODC) to control particulate emissions - chapter 31 modification of PTI 02-12229, issued on December 18, 2001.		Compliance with the Air Toxic Policy as specified in Sections B.III.1. through B.III.

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1. Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA’s “Air Toxic Policy” was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.
- 2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's “Review of New Sources of Air Toxic Emissions” policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the “worst case” pollutant(s):

Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$)	Maximum Acceptable Ground Level Concentration (MAGLC), ($\mu\text{g}/\text{m}^3$)
P025	Ethyl acetate	1,465,829.21	111	22,300	
P027	Ethyl acetate	1,465,829.21	96	5,822	
P028	Ethyl acetate	1,465,829.21	111	22,300	
P027 + P028	Ethyl acetate	1,465,829.21	318	50,423	146,583

3. 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 still 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:
- c. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - d. 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
 - e. 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.).
4. 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.
- a. 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:”

- b. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- c. documentation of its evaluation and determination that the changed emissions unit still satisfies the “Air Toxic Policy”; and
- f. 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 - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P026 - Injection mold press no. 21 with a slitter system for reinforced plastic composite parts - chapter 31 modification of PTI 02-13528, issued on December 1, 1999.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.29 lbs/hr, 30.87 lbs/day and 5.63 tons/year. The requirements of this rule also include compliance with the requirement of the daily limit in OAC rule 3745-21-07(G)(2) and the requirements of 40 CFR Parts 63.5780 - 63.5935. See section A.2.a.
	OAC rule 3745-21-07(G)(2)	The hourly and daily emissions limitation specified by this rule are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 63, Subpart WWWW	See section A.2.b. and Part II section A.

2. Additional Terms and Conditions

- 2.a The OC emissions from the molding operations consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) .
- 2.b The following work practice(s) shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and specified in Table 4 of 40 CFR, Part 63, Subpart WWWW:
 - i. only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - ii. mold compound materials may be uncovered before slitting, but must be recovered after slitting.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1.** Except as otherwise provided in this section, the permittee shall perform inspections of production material charges associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize HAP emissions are employed. The inspections shall be performed during representative, normal operating conditions.
- 2.** The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each sheet mold compound (SMC) employed;
 - b. The weight of each sheet mold compound (SMC) employed, in pounds;
 - c. The weight of all sheet mold compound (SMC) employed, in pounds;
 - d. The total OC emission rate for all materials employed, in pounds;
 - e. The actual number of hours the emissions unit was in operation;
 - f. The average hourly OC emission rate for all materials employed, i.e., (d)/(e), in pounds per hour (average);
 - g. The date and reason any required inspection was not performed; and
 - h. The dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.
- 3.** The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each record. Retention of copies of the semi-annual compliance report(s), required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

IV. Reporting Requirements

- 1.** The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the production materials exceeded 1.29 pounds per hour, and the actual average hourly OC emissions for each such day;

- b. An identification of each day during which the OC emissions from the production materials exceeded 30.87 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which include certified statements in the notice of compliance status that state the following:
- a. only one charge of molding compound was uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - b. mold compound materials were recovered after slitting.

The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date. The initial compliance report must be submitted by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

3. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:
- a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirements in section A.I.2.b., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.
 - b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:
 - i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - iii. Date of the report and beginning and ending dates of the reporting period;
 - iv. The total operating time of this emissions unit; and
 - v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.
 - c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).

4. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year, in tons/year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation: 1.29 lbs OC/hr.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.f. If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emissions Limitation: 30.87 lbs OC/day.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.d. Compliance may be determined based upon the following equation:

$$E_{OC} = \text{summation of } (W_i_{SMC} \times EF).$$

where:

E_{OC} = the daily, OC emissions for all materials, in pounds per day.

W_i_{SMC} = the weight of SMC "i" employed, in pounds per day.

EF = emission factor for styrene emissions from the mold press, which is 0.00134 pounds per pound of mold compound materials, as determined from a Society of Plastics Industry report, "Styrene Emissions during the Charging and Molding Cycle."

- c. Emissions Limitation: 5.63 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the mold compounds, E_{OC} , as specified in section E.1.b. of this permit for the calendar year, divided by 2,000 pounds/ton.

2. Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may

require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
P026 - Injection mold press no. 21 with a slitter system for reinforced plastic composite parts - chapter 31 modification of PTI 02-13528, issued on December 1, 1999.		Compliance with the Air Toxic Policy as specified in Section B.III.1.

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1. Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA’s “Air Toxic Policy” was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

Venture Holdings Corporation

PTI Application: 02-18224

Issued: To be entered upon final issuance

Facility ID: 0204020245

Emissions Unit ID: P026

VI. Miscellaneous Requirements

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P027 - 48 inch sheet mold compound (SMC) machine no. 2 - chapter 31 modification of PTI 02-15715, issued on January 15, 2001.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 2.55 lbs/hr from production operations. OC emissions shall not exceed 261.1 lbs/week from cleanup/purge operations. OC emissions shall not exceed 18.0 tons/year from production operations and from cleanup/purge operations. The requirements of this rule also include compliance with the requirements of 40 CFR Parts 63.5780 - 63.5935. See sections A.I.2.a. and A.II.1.
	OAC rule 3745-21-07(G)(2)	The hourly emissions limit based on this applicable rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3). See section A.I.2.b.
	OAC rule 3745-21-07(G)(9)(g)	OC emissions shall not exceed 61.20 lbs/day from production operations. See section A.I.2.c.
	40 CFR, Part 63, Subpart WWWW	See section A.I.2.d. and Part II section A.

2. Additional Terms and Conditions

- 2.a The OC emissions from the production operations consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) .

- 2.b** This emissions unit is exempt from the daily OC emissions limitation specified in OAC rule 3745-21-07(G)(2) because it meets the requirements specified in OAC rule 3745-21-07(G)(9)
- 2.c** Emissions of hazardous air pollutants (HAPs) from this emissions unit shall not exceed 61.20 lbs/day from production operations.
- 2.d** The following work practice(s) shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and specified in Table 4 of 40 CFR, Part 63, Subpart WWWW:
 - i.** the resin delivery system to the doctor box on each SMC manufacturing machine must be closed or covered. The doctor box itself may be open;
 - ii.** a nylon containing film must be used to enclose SMC; and
 - iii.** the use of HAP containing cleaning solvents is prohibited, except that styrene may be used as a cleaner in closed systems.

II. Operational Restrictions

- 1. The use of photochemically reactive cleanup/purge materials is prohibited for open cleanup/purge operations.

III. Monitoring and/or Record keeping Requirements

- 1. Except as otherwise provided in this section, the permittee shall perform inspections of production operations and cleanup operations associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize HAP emissions are employed. The inspections shall be performed during representative, normal operating conditions.
- 2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification of each SMC material produced;
 - b. the weight of each SMC material produced, in pounds per day;
 - c. the total OC content, the total VOC content and the total HAP content of each SMC material produced, in percent by weight;
 - d. the total OC emissions rate, the total VOC emissions rate and the total HAP emissions rate for all SMC materials, in pounds per day;
 - e. the actual number of hours that the emissions unit was in operation;

- f. the average hourly OC emissions rate for all SMC materials, i.e., (d) divided by (e), in pounds per hour (average);
 - g. the date and reason any required inspection was not performed; and
 - h. the dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.
- 3.** The permittee shall collect and record the following information for each week for this emissions unit:
- a. the company identification of each cleanup/purge material employed;
 - b. the total volume of each cleanup/purge material applied, in gallons;
 - c. the OC content of each cleanup/purge material applied, in pound per gallon;
 - d. if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports, records of the total amount (gallons) of cleanup and purge material collected from this emissions unit and added to the recovery tank/drum, for recycle/recovery and/or disposal at an outside facility, shall be maintained as required in Section A.III.3.;
 - e. if a credit for recovered cleanup/purge material is used, the volume of this material added to the recovery tank/drum, in gallons per week;
 - f. if a credit for recovered materials is used, the adjusted volume of cleanup/purge materials employed, calculate by subtracting the volume of the recovered cleanup/purge material added to the recovery tank/drum (d), from the volume of the total cleanup/purge material applied (b), in gallons per week; and
 - g. the total OC emissions rate for all cleanup/purge materials, in pounds per week.
- 4.** If a credit for recovered materials from this emissions unit is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup and purge materials, and the recovery drum or tank serving this emissions unit:
- a. the date the materials from the recovery drum or tank were shipped off site; and
 - b. the number of gallons of materials from the recovery drum or tank shipped off site
- 5.** The permittee shall maintain information to document that each cleanup/purge material applied in this emissions unit is non-photochemically reactive.
- 6.** The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each

record. Retention of copies of the semi-annual compliance report(s) , required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

IV. Reporting Requirements

- 1.** The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly OC emissions from the production operations exceeded 2.55 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. an identification of each day during which the OC emissions from the production operations exceeded 61.20 pounds per day, and the actual OC emissions for each such day;
 - c. an identification of each day during which the total HAP emissions from the production operations exceeded 61.20 pounds per day, and the actual HAP emissions for each such day;
 - d. an identification of each week during which the OC emissions from the cleanup/purge operations exceeded 261.1 pounds per week, and the actual OC emissions for each such week;
 - e. an identification of each day during which any photochemically reactive cleanup/purge materials were employed.

- 2.** The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which include certified statements in the notice of compliance status that state the following:
 - a. the resin delivery system to the doctor box on each SMC manufacturing machine was closed or covered;
 - b. a nylon containing film must was used to enclose SMC; and
 - c. no HAP containing cleaning solvents were used, except that styrene may be used as a cleaner in closed systems.

The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date. The initial compliance report must be submitted by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

3. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:
 - a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirements in section A.I.2.d., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.
 - b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:
 - i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - iii. Date of the report and beginning and ending dates of the reporting period;
 - iv. The total operating time of this emissions unit; and
 - v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.
 - c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).
4. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 of each year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation: 2.55 lbs OC/hr from production operations.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.f. If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emissions Limitation: 61.20 lbs OC/day from production operations.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.d. Compliance may be determined based upon the following equation:

$$EP_{OC} = \text{summation of } [W_i \times OC_i \times EF(OC)].$$

where:

EP_{OC} = OC emissions as styrene from the polyester resin/styrene paste compound production operations, in pounds per day.

W_i = the weight of SMC "i" produced, in pounds per day.

OC_i = the styrene content of SMC "i", in percent by weight.

$EF(OC)$ = the styrene emissions factor, in 0.0012 pound of styrene emissions per pound of available styrene content, as determined from a Budd Plastics Division study, as presented to the October, 1999 Composite Fabricators Association Conference.

- c. Emissions Limitation: 61.20 lbs HAP/day from production operations.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.d.

- d. Emission Limitation: 261.1 lbs OC/week from cleanup/purge operations.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.3.g. Compliance may be determined based upon the following equation:

$$EC(OC) = \text{summation of } (V_i \times OC_i).$$

where:

$EC(OC)$ = OC emissions from the cleanup/purge operations, in pounds per week.

V_i = the volume of cleanup/purge material applied, from Sections A.III.3.b. or A.III.3.f., in gallons per week.

OC_i = the OC content of cleanup/purge material "i", in per pounds per gallon.

- e. Emissions Limitation: 18.0 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the production operations, EP_{OC} , added to the sum of the weekly OC emissions rates from the cleanup/purge operations, EC_{OC} , as specified in section E.1.b. and E.1.d., respectively, of this permit for the calendar year, divided by 2,000 pounds/ton.

2. Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by

formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P027 - 48 inch sheet mold compound (SMC) machine no. 2 - chapter 31 modification of PTI 02-15715, issued on January 15, 2001.		Compliance with the Air Toxic Policy as specified in Sections B.III.1. through B.III.4.

2. **Additional Terms and Conditions**

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA’s “Air Toxic Policy” was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.
2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's “Review of New Sources of Air Toxic Emissions” policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the “worst case” pollutant(s):

Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$)	Maximum Acceptable Ground Level Concentration (MAGLC), ($\mu\text{g}/\text{m}^3$)
P025	Ethyl acetate	1,465,829.21	111	22,300	
P027	Ethyl acetate	1,465,829.21	96	5,822	
P028	Ethyl acetate	1,465,829.21	111	22,300	
P027 + P028	Ethyl acetate	1,465,829.21	318	50,423	146,583

3. 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:
- g. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - h. 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
 - i. 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.).
4. 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.
- a. 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:”

- b. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- c. documentation of its evaluation and determination that the changed emissions unit still satisfies the “Air Toxic Policy”; and
- j. 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 - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P028 - mixer 1 for polyester resin/styrene paste production with a baghouse (JAYCODC) to control particulate emissions - chapter 31 modification of PTI 02-896, issued on February 19, 1982.	OAC rule 3745-31-05(A)(3) OAC 3745-17-07(A)(1) OAC 3745-17-11 OAC rule 3745-21-07(G)(2) 40 CFR, Part 63, Subpart WWWW	Visible particulate emissions (PE) shall not exceed 5% opacity as a 6-minute average. The PE rate shall not exceed 0.52 lb/hr and 2.28 tons/year. Organic compound (OC) emissions shall not exceed 1.49 lbs/hr and 35.8 lbs/day from production operations. OC emissions shall not exceed 261.1 lbs/week from cleanup/purge operations. OC emissions shall not exceed 13.3 tons/year from production operations and from cleanup/purge operations. The requirements of this rule also include compliance with the requirements of 40 CFR Parts 63.5780 - 63.5935. See sections A.I.2.a. and A.II.1. The requirements of these rules are less stringent than the requirements of OAC rule 3745-31-05(A)(3). See section A.2.b. and Part II section A.

2. Additional Terms and Conditions

- 2.a The OC emissions from the production operations consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) .
- 2.b The following work practice(s) shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and specified in Table 4 of 40 CFR, Part 63, Subpart WWWW:

- i.** use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;
- ii.** keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels; and
- iii.** the use of HAP containing cleaning solvents is prohibited, except that styrene may be used as a cleaner in closed systems.

II. Operational Restrictions

1. The use of photochemically reactive cleanup/purge materials is prohibited for open cleanup/purge operations.
2. The pressure drop across the baghouse shall be maintained within the range recommended by the manufacturer while the emissions unit is in operation or within a range established during the most recent performance test that demonstrated that the emissions unit was in compliance.

III. Monitoring and/or Record keeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of production operations and cleanup operations associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize HAP emissions are employed. The inspections shall be performed during representative, normal operating conditions.
2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each resin/styrene paste material produced;
 - b. the weight of each polyester resin/styrene paste material produced, in pounds per day;
 - c. the total OC content of each polyester resin/styrene paste material produced, in percent by weight;
 - d. the total OC emissions rate for all polyester resin/styrene paste materials, in pounds per day;
 - e. the actual number of hours that the emissions unit was in operation;
 - f. the average hourly OC emissions rate for all polyester resin/styrene paste materials, i.e., (d) divided by (e), in pounds per hour (average);
 - g. the date and reason any required inspection was not performed; and

63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

8. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly OC emissions from the production operations exceeded 1.49 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. an identification of each day during which the OC emissions from the production operations exceeded 35.8 pounds per day, and the actual OC emissions for each such day;
 - c. an identification of each week during which the OC emissions from the cleanup/purge operations exceeded 261.1 pounds per week, and the actual OC emissions for each such week;
 - d. an identification of each day during which any photochemically reactive cleanup/purge materials were employed; and
 - e. an identification of each day during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.2.
2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which include certified statements in the notice of compliance status that state the following:
 - a. use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;
 - b. keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels; and
 - c. no HAP containing cleaning solvents were used, except that styrene may be used as a cleaner in closed systems.

The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date. The initial compliance report must be submitted

by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

3. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:
 - a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirements in section A.I.2.b., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.
 - b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:
 - i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - iii. Date of the report and beginning and ending dates of the reporting period;
 - iv. The total operating time of this emissions unit; and
 - v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.
 - c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).
4. The permittee shall submit annual reports which specify the total OC emissions and the total PE rate from this emissions unit for the previous calendar year. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 of each year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 5% opacity of visible PE, as a 6-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, and the procedures specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation: 0.52 lb PE/hr.

Applicable Compliance Method(s): To determine the actual worst case emission rate for particulate matter, the following equation may be used:

$$E_{PE} = P \times EF \times (1 - CE/100).$$

Where the following applies:

E_{PE} = PE, in pounds per hour.

P = maximum dry solids throughput rate, which is 4200 pounds per hour as noted in the permit application.

EF = emission factor for uncontrolled PE, which is 0.01 pounds of uncontrolled PE per pound of dry solids processed, as noted in section 6.4 of AP-42 chapter 6.4 (5/83).

CE = control efficiency of the PE control device, in percent which is 99 as noted in the permit application.

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

- c. Emission Limitation: 2.28 TPY PE.

Applicable Compliance Method: To determine the annual rate for PE, the worst case, hourly emission rate as determined in section A.V.1.b. shall be multiplied by the actual hours of operation, as specified in the record keeping requirements of section A.III.2.e., and divided by 2000 lbs/ton.

- d. Emissions Limitation: 1.49 lbs OC/hr from production operations.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.f. If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- e. Emissions Limitation: 35.8 lbs OC/day from production operations.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.d. Compliance may be determined based upon the following equation:

$$EP_{OC} = \text{summation of } [W_i \times OC_i \times EF(OC)].$$

where:

EP_{OC} = OC emissions as styrene from the polyester resin/styrene paste mix production operations, in pounds per day.

W_i = the weight of resin paste mix "i" produced, in pounds per day.

OC_i = the styrene content of resin paste mix "i", in percent by weight.

$EF(OC)$ = the styrene emissions factor, which is 0.00083 pound of styrene emissions per pound of available styrene content, as determined from engineering estimates noted in the application for PTI 02-18224. After submittal of the exhaust gas testing report to the Northeast District Office as required by section A.V.3., a revised styrene emissions factor will be employed.

- f. Emission Limitation: 261.1 lbs OC/week from cleanup/purge operations.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.3.g. Compliance may be determined based upon the following equation:

$$EC(OC) = \text{summation of } (V_i \times OC_i).$$

where:

$EC(OC)$ = OC emissions from the cleanup/purge operations, in pounds per week.

V_i = the volume of cleanup/purge material applied, from Sections A.III.3.b. or A.III.3.f., in gallons per week.

OC_i = the OC content of cleanup/purge material "i", in per pounds per gallon.

- g. Emissions Limitation: 13.3 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the production operations, EP_{OC} , added to the sum of the daily OC emissions rates from the cleanup/purge operations, EC_{OC} , as specified in section E.1.e. and E.1.f., respectively, of this permit for the calendar year, divided by 2,000 pounds/ton.

2. Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).

3. The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months after issuance of the permit .
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emissions rate(s) for OC, in lbs/hr, and to develop a styrene emissions factor, in pounds of styrene emissions per pound of available styrene content.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for organic compounds, Method 25A or Method 18 of 40 CFR Part 60, Appendix A, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).
 - f. Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to

ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P028 - mixer 1 for polyester resin/styrene paste production with a baghouse (JAYCODC) to control particulate emissions - chapter 31 modification of PTI 02-896, issued on February 19, 1982.		Compliance with the Air Toxic Policy as specified in Sections B.III.1. through B.III.4.

2. **Additional Terms and Conditions**

None.

II. Operational Restrictions

None.

III. Monitoring and/or Record keeping Requirements

1. Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA’s “Air Toxic Policy” was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.
2. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit’s exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA’s “Review of New Sources of Air Toxic Emissions” policy (“Air Toxic Policy”) was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the “worst case” pollutant(s):

Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$)	Maximum Acceptable Ground Level Concentration (MAGLC), ($\mu\text{g}/\text{m}^3$)
P025	Ethyl acetate	1,465,829.21	111	22,300	
P027	Ethyl acetate	1,465,829.21	96	5,822	
P028	Ethyl acetate	1,465,829.21	111	22,300	
P027 + P028	Ethyl acetate	1,465,829.21	318	50,423	146,583

3. 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:
- k. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - l. 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
 - m. 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.).
4. 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.

- a. 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:”
- b. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- c. documentation of its evaluation and determination that the changed emissions unit still satisfies the “Air Toxic Policy”; and
- n. 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 - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P029 - Injection mold press no. 11 with a slitter system for reinforced plastic composite parts	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.21 lbs/hr, 28.94 lbs/day and 5.28 tons/year. The requirements of this rule also include compliance with the requirement of the daily limit in OAC rule 3745-21-07(G)(2) and the requirements of 40 CFR Parts 63.5780 - 63.5935. See section A.2.a.
	OAC rule 3745-21-07(G)(2)	The hourly and daily emissions limitation specified by this rule are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 63, Subpart WWWW	See section A.2.b. and Part II section A.

2. Additional Terms and Conditions

- 2.a The OC emissions from the molding operations consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) .
- 2.b The following work practice(s) shall be employed to minimize the generation of hazardous air pollutant (HAP, i.e. styrene) emissions as required in 40 CFR 63.5805(a) and specified in Table 4 of 40 CFR, Part 63, Subpart WWWW:
 - i. only one charge of molding compound may be uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - ii. mold compound materials may be uncovered before slitting, but must be recovered after slitting.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1.** Except as otherwise provided in this section, the permittee shall perform inspections of production material charges associated with this emissions unit on a once per day basis. The purpose of the inspections is to ensure that work practice(s) to minimize HAP emissions are employed. The inspections shall be performed during representative, normal operating conditions.
- 2.** The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each sheet mold compound (SMC) employed;
 - b. The weight of each sheet mold compound (SMC) employed, in pounds;
 - c. The weight of all sheet mold compound (SMC) employed, in pounds;
 - d. The total OC emission rate for all materials employed, in pounds;
 - e. The actual number of hours the emissions unit was in operation;
 - f. The average hourly OC emission rate for all materials employed, i.e., (d)/(e), in pounds per hour (average);
 - g. The date and reason any required inspection was not performed; and
 - h. The dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.
- 3.** The permittee shall maintain records of certified statements, required by 40 CFR 63.5915(d), regarding compliance with the work practice(s) standard for 5 years following the date of each record. Retention of copies of the semi-annual compliance report(s), required by 40 CFR 63.5910(b) and required by the reporting requirement in section A.IV.3., will fulfill the requirements of this permit term.

IV. Reporting Requirements

- 1.** The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the production materials exceeded 1.21 pounds per hour, and the actual average hourly OC emissions for each such day;

- b. An identification of each day during which the OC emissions from the production materials exceeded 28.94 pounds per day, and the actual OC emissions for each such day.
2. The permittee shall submit an initial compliance report, required by 40 CFR 63.5860(a), which include certified statements in the notice of compliance status that state the following:
- a. only one charge of molding compound was uncovered, unwrapped, or exposed per mold cycle per compression/injection molding press; and
 - b. mold compound materials were recovered after slitting.

The initial compliance report must cover the period beginning on the operations startup date, as required in 40 CFR 63.5800 and specified in Table 2 of 40 CFR, Part 63, Subpart WWWW, and ending June 30 or December 31, whichever date is the first date following the end of the first calendar half after the operations startup date. The initial compliance report must be submitted by July 31 or January 31, whichever date follows the end of the first calendar half after the operations startup date.

3. The permittee shall submit semi-annual compliance reports, required by 40 CFR 63.5910(b) which includes the following information:
- a. If there were no deviations from the work practice standards, required by 40 CFR 63.5805(a) as well as by the control measure requirements in section A.I.2.b., and if there were no deviations from the record keeping requirements in sections A.III.2.g. and A.III.2.h., a statement that there were no deviations during the reporting period.
 - b. If there was a deviation from the work practice standards during the reporting period the following information, required by 40 CFR 63.5910(d), must be submitted:
 - i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - iii. Date of the report and beginning and ending dates of the reporting period;
 - iv. The total operating time of this emissions unit; and
 - v. Information on the number, duration, and cause of deviations (including unknown cause if applicable), and the corrective action(s) taken.
 - c. A semi-annual compliance report shall be submitted to the Ohio EPA Northeast District Office every six months, i.e. by January 31 and July 31 of each year for the previous six calendar months, as required by 40 CFR 63.5910(b)(3) and 40 CFR 63.5910(b)(4).

4. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year, in tons/year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation: 1.21 lbs OC/hr.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.f. If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emissions Limitation: 28.94 lbs OC/day.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2.d. Compliance may be determined based upon the following equation:

$$E_{OC} = \text{summation of } (W_i_{SMC} \times EF).$$

where:

E_{OC} = the daily, OC emissions for all materials, in pounds per day.

W_i_{SMC} = the weight of SMC "i" employed, in pounds per day.

EF = emission factor for styrene emissions from the mold press, which is 0.00134 pounds per pound of mold compound materials, as determined from a Society of Plastics Industry report, "Styrene Emissions during the Charging and Molding Cycle."

- c. Emissions Limitation: 5.28 TPY OC.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the mold compounds, E_{OC} , as specified in section E.1.b. of this permit for the calendar year, divided by 2,000 pounds/ton.

2. Any analysis of a material shall be based on the material as employed, including the addition of any monomer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 - Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may

require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

The total organic HAP content may be determined by an analysis of the material, as employed, by U.S. EPA Reference Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph as referenced in 40 CFR Part 63, Appendix A. The styrene content, ethyl acrylate content and methyl methacrylate content may be determined by an analysis of the material, as employed, by ASTM D 4827-93 or ASTM D 4747-87. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed on the material(s).

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
P029 - Injection mold press no. 11 with a slitter system for reinforced plastic composite parts		Compliance with the Air Toxic Policy as specified in Section B.III

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1. Modeling the federally regulated pollutant, styrene, a hazardous air pollutant (HAP), to demonstrate compliance with the Ohio EPA’s “Air Toxic Policy” was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart WWWW, which was promulgated no more than 5 years ago.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.