



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

6/4/2013

Genevieve Damico *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: Composite Engineering LLC
Facility ID: 1413010484
Permit Type: Renewal
Permit Number: P0112137

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-3631 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Southwest Ohio Air Quality Agency



PROPOSED

**Division of Air Pollution Control
Title V Permit
for
Composite Engineering LLC**

Facility ID:	1413010484
Permit Number:	P0112137
Permit Type:	Renewal
Issued:	6/4/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Composite Engineering LLC

Table of Contents

Authorization	1
A. Standard Terms and Conditions	2
1. Federally Enforceable Standard Terms and Conditions	3
2. Monitoring and Related Record Keeping and Reporting Requirements.....	3
3. Scheduled Maintenance.....	6
4. Risk Management Plans	6
5. Title IV Provisions	7
6. Severability Clause	7
7. General Requirements	7
8. Fees.....	8
9. Marketable Permit Programs.....	8
10. Reasonably Anticipated Operating Scenarios	9
11. Reopening for Cause	9
12. Federal and State Enforceability	9
13. Compliance Requirements	9
14. Permit Shield	11
15. Operational Flexibility.....	11
16. Emergencies.....	11
17. Off-Permit Changes	12
18. Compliance Method Requirements	12
19. Insignificant Activities or Emissions Levels.....	12
20. Permit to Install Requirement.....	13
21. Air Pollution Nuisance	13
22. Permanent Shutdown of an Emissions Unit	13
23. Title VI Provisions	13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only	14
25. Records Retention Requirements Under State Law Only.....	14
26. Inspections and Information Requests	14
27. Scheduled Maintenance/Malfunction Reporting	15
28. Permit Transfers	15



29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	15
B. Facility-Wide Terms and Conditions.....	16
C. Emissions Unit Terms and Conditions	18
1. P001, fiberglass spray operation	19
2. P002, gel coat operation	29
3. P003, hand layup area	39



Proposed Title V Permit

Composite Engineering LLC

Permit Number: P0112137

Facility ID: 1413010484

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1413010484
Facility Description: Fiberglass Lay-up Operations for Production of Fiberglass Vehicle Components
Application Number(s): A0044069
Permit Number: P0112137
Permit Description: Renewal of Title V Operating Permit for Composite Engineering, LLC, a manufacturer of fiberglass vehicle components, which includes fiberglass layup operations (spray and manual) and gel coating application.
Permit Type: Renewal
Issue Date: 6/4/2013
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0097489

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Composite Engineering LLC
2028 State Route 125
Amelia, OH 45102

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Southwest Ohio Air Quality Agency. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Proposed Title V Permit
Composite Engineering LLC
Permit Number: P0112137
Facility ID: 1413010484
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

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

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

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



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

- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

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

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive



measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

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

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the



insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

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

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Southwest Ohio Air Quality Agency.

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

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

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

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:



- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

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

5. Title IV Provisions

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

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

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

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

7. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the



Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
- (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

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



10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

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

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

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

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official



that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) 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.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) 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:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. An identification of each term or condition of this permit that is the basis of the certification.
 - b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent.



- d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

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

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

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



17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

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

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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



20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.



- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

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

25. Records Retention Requirements Under State Law Only

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.

26. Inspections and Information Requests

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



this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

27. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. 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.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c) where the company's responsible official has certified that an emissions unit has been permanently shut down.



Proposed Title V Permit
Composite Engineering LLC
Permit Number: P0112137
Facility ID: 1413010484
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

a) None.

2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, and/or 40 CFR Part 60 or 63:

P004 Facility-wide cleanup [Permit to Install 14-05838]

P005 Sanding operation[Permit to Install 14-05838]

3. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants (NESHAP) Reinforced Plastic Composites Production: P001, P002, P003, and P004. The complete NESHAP requirements, including the NESHAP General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

(Authority for term: 40 CFR Part 63)

4. The following abbreviations are used throughout this permit:

HAP = Hazardous Air Pollutant

OC = Organic Compounds

VOC = Volatile Organic Compounds

PE = Particulate matter measurable by the applicable test methods in 40 CFR Part 60, Appendix A, "Standards of Performance for New Stationary Sources"

PM₁₀ = Particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers as measured either by a reference method that is based on 40 CFR Part 50, Appendix J and designated in accordance with 40 CFR Part 53 or by an equivalent method designated in accordance with 40 CFR Part 53

TPY = Tons per year

PTI = Permit to Install

CFR = Code of Federal Regulations

OAC = Ohio Administrative Code



Proposed Title V Permit
Composite Engineering LLC
Permit Number: P0112137
Facility ID: 1413010484
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P001, fiberglass spray operation

Operations, Property and/or Equipment Description:

Fiberglass resin spray operation

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [PTI 14-05838, issued 9/26/2006]	OC emissions shall not exceed 1.43 pounds per hour and 34.3 pounds per day. See b)(2)a. and b)(2)b. PM ₁₀ emissions shall not exceed 0.551 pound per hour. PE and PM ₁₀ emissions shall not exceed 2.41 TPY. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW, OAC rule 3745-17-07(A)(1), and OAC rule 3745-17-11(B)(1).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)(1) Table I	PE shall not exceed 0.551 pound per hour. See b)(2)a.
d.	OAC rules 3745-21-25(A) through (S)	The requirements of this rule for the control of VOC emissions are equivalent to the requirements established in 40



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		CFR Part 63, Subpart WWWW, for the control of organic HAP emissions. Compliance with the emission limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW will satisfy the requirements of this rule.
e.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 5935)</p> <p>[In accordance with 40 CFR 63.5790 and 63.5795, this emissions unit may include the following open molding operations: non-atomized resin application and filament application, material mixing, and HAP-containing materials storage associated with open molding at a new reinforced plastic composites production facility subject to the emission limits and work practice standards specified in this section.]</p>	<p>Table 3 to 40 CFR Part 63, Subpart WWWW - Organic Hazardous Air Pollutant (HAP) Emission Limits for Specific Open Molding, Centrifugal Casting, Pultrusion, and Continuous Lamination/Casting Operations shows which emission limits apply based upon the type of operation and the method of resin and gel coat application.</p> <p>See b)(2)d. for a listing of the specific emission limitations and c)(2) for compliance demonstration options.</p> <p>Table 4 to 40 CFR Part 63, Subpart WWWW- Applicable Work Practice Standards. See b)(2)c. and c)(1).</p>
f.	40 CFR Part 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

- a. The hourly OC emission limitation represents the emissions unit’s Potential to Emit (PTE). Therefore, no hourly recordkeeping and/or reporting requirements are required to demonstrate compliance with this emission limit.

The hourly PM₁₀ emission limitation of 0.551 pound per hour is based upon the federally enforceable rule limitation in Table I of OAC rule 3745-17-11 for PE, assuming that all PE is PM₁₀. The PE and PM₁₀ emission limitation of 0.551 pound per hour is greater than the potential to emit (PTE) of this emissions unit based upon the maximum material application rates, transfer efficiency, and control efficiency of the fiberglass resin spray operation [see f)(1)d.]. Therefore, no hourly recordkeeping and/or reporting requirements are required to demonstrate compliance with this emission limit.



- b. OC emissions shall not exceed 20.0 TPY from emissions units P001, P002, and P003, combined.
- c. The permittee shall comply with the applicable work practice standards specified in Table 4 of 40 CFR Part 63, Subpart WWWW, including the following:
 - i. Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1.0 inch are permissible around mixer shafts and any required instrumentation;
 - ii. Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety;
 - iii. Keep the mixer covers closed while actual mixing is occurring, except when adding materials or changing covers to the mixing vessels;
 - iv. Containers of five gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin); and
 - v. Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
- d. The following organic HAP emission limitations shall not be exceeded, based on application technique and material properties, as specified in Table 3 of 40 CFR Part 63, Subpart WWWW:

If your operation type is . . .	And you use . . .	¹Your organic HAP emissions limit is . . .
1. open molding—corrosion-resistant and/or high strength (CR/HS)	a. mechanical resin application b. filament application c. manual resin application	113 lb/ton. 171 lb/ton. 123 lb/ton.
2. open molding—non-CR/HS	a. mechanical resin application b. filament application c. manual resin application	88 lb/ton. 188 lb/ton. 87 lb/ton.
3. open molding—tooling	a. mechanical resin application b. manual resin application	254 lb/ton. 157 lb/ton.
4. open molding—low-flame spread/low-smoke products	a. mechanical resin application b. filament application c. manual resin application	497 lb/ton. 270 lb/ton. 238 lb/ton.
5. open molding—shrinkage controlled resins ²	a. mechanical resin application b. filament application c. manual resin application	354 lb/ton. 215 lb/ton. 180 lb/ton.
6. open molding—gel coat ³	a. tooling gel coating b. white/off white pigmented gel coating c. all other pigmented gel coating	440 lb/ton. 267 lb/ton. 377 lb/ton.



Effective Date: To be entered upon final issuance

	d. CR/HS or high performance gel coat	605 lb/ton.
	e. fire retardant gel coat	854 lb/ton.
	f. clear production gel coat	522 lb/ton.

¹Organic HAP emissions limits for open molding and centrifugal casting are expressed as lb/ton. You must be at or below these values based on a 12-month rolling average.

²This emission limit applies regardless of whether the shrinkage controlled resin is used as a production resin or a tooling resin.

³If you only apply gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If you use multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, you may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.

c) Operational Restrictions

- (1) The permittee shall employ non-HAP containing cleanup solvent in this emissions unit.
 (Authority for term: 40 CFR Part 63, Subpart WWWW, OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(A)(1))
- (2) The permittee shall utilize one or more compliance options, as specified in 40 CFR 63.5810 to demonstrate compliance with the emission standards for open molding in Table 3 of this subpart, as described in the following sections:

63.5810(a)	individual resin or gel coat compliance demonstration
63.5810(b)	average individual organic HAP emissions limit compliance demonstration for all operations and application methods
63.5810(c)	weighted average emission limit compliance demonstration
63.5810(d)	organic HAP emission limit compliance demonstration for one resin type and application method

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart WWWW)

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each day for the coating operation in this emissions unit:
 - a. The company identification for each coating (resin or gel coat) employed;
 - b. The amount of each coating (resin or gel coat) employed, in pounds;



Effective Date: To be entered upon final issuance

- c. The styrene and/or OC content, recorded in percent weight, of each coating (resin or gel coat); and
- d. The total OC emission rate from all coatings (resin and gel coat), in pounds per day [the summation of (b. divided by 2000 pounds per ton) x (emission factor from the Composite Fabricators Association (CFA) Unified Emission Factors for Open Molding of Composites) for all resins and gel coats employed in this emissions unit during the day].

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

- (2) The permittee shall collect and record the annual OC emissions, in tons per year, from emissions units P001, P002, and P003, combined. For P001, the annual OC emissions may constitute a summation of the daily OC emissions, as calculated in d)(1)d., for a consecutive 365-day period.

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

- (3) The permittee shall collect and record the following information for each month for the coating operation in this emissions unit:
 - a. the company identification for each coating (resin and gel coat) employed;
 - b. the amount of each coating (resin and gel coat) employed, in pounds;
 - c. the organic HAP content, recorded in percent weight, of each coating (resin and gel coat);
 - d. the organic HAP emissions in pounds per ton of resin or gel coat employed, calculated using the equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW; and
 - e. the rolling, 12-month average organic HAP emissions limit in pounds per ton of resin or gel coat employed, using the procedures outlined in 40 CFR 63.5810.

(Authority for term: 40 CFR Part 63, Subpart WWWW, OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1))

- (4) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart WWWW, including the following sections:

63.5895(c) - (d)	records of resin and gel coat use, organic HAP content, operation and application method(s)
63.5915(a)	copy of compliance notification(s) and report(s)
63.5915(c)	records of all calculations and data used to determine organic HAP emissions factors or



	average organic HAP contents for operations and application methods as specified under 63.5810
63.5915(d)	certified statement of compliance with work practice requirements
63.5920(a) – (d)	record keeping format and retention requirements

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 63, Subpart WWWW)

- (5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-05838, issued on 9/26/2006:d)(1) through d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the daily OC emission limitation of 34.4 pounds per day;
 - b. any deviation from the prohibition of the use of HAP-containing cleanup solvent;
 - c. all exceedances of the organic HAP emission limitations in pounds per ton of resin or gel coat as specified in b)(2)d.; and
 - d. any deviation from the HAP-containing material storage requirements in b)(2)c.v.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

- (2) The permittee shall submit annual reports which specify the total OC emissions from emissions units P001, P002, and P003, combined. This report shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

- (3) The permittee shall submit semi-annual reports and such other notifications and reports to the Southwest Ohio Air Quality Agency as are required in 40 CFR Part 63, Subpart WWWW, pursuant to the following sections:



63.5905(a) and Table 13	initial notification and notification of compliance status
63.5905(b)	15-day notification of change(s)
63.5910(a) - (b) and Table 14	semi-annual compliance reports
63.5910(c) - (i) and Table 14	content of semi-annual compliance reports

The semi-annual reporting requirement may be satisfied by including and identifying the information in 63.5910(c) - (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 63, Subpart WWWW)

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-05838, issued on 9/26/2006:e)(1) through e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

OC emissions shall not exceed 1.43 pounds per hour.

Applicable Compliance Method:

The OC hourly emission limitation above represents the emissions unit's potential to emit. The OC emission limitation was established based on information supplied by the permittee in the application for PTI 14-05838, issued on 9/26/2006, and Application A0044069 submitted on November 30, 2012, for Title V Operating Permit P0112137 as follows:

0.01950 ton open-molding, non-atomized resin mechanical application rate/hour
 x 72.50 pounds OC/ton resin = 1.41375 pounds OC/hour

0.00029 ton open-molding, non-atomized resin mechanical application rate/hour
 x 40.00 pounds OC/ton resin = 0.012 pound OC/hour

1.41375 pound OC/hour + 0.012 pound OC/hour = 1.43 pounds OC/hour

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))



b. Emission Limitation:

OC emissions shall not exceed 34.3 pounds per day.

Applicable Compliance Method:

Compliance with the daily OC emission limitation shall be based upon the record keeping specified in d)(1).

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

c. Emission Limitation:

OC emissions from emissions units P001, P002, and P003, combined, shall not exceed 20.0 TPY.

Applicable Compliance Method:

Compliance with the annual OC emission limitation from P001, P002, and P003, combined, shall be based upon the record keeping specified in d)(2).

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

d. Emission Limitations:

PM₁₀ emissions shall not exceed 0.551 pound per hour.

PE shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

The PE/PM₁₀ emission limitations represent the federally-enforceable rule limitation in Table I of OAC rule 3745-17-11(B) as follows:

For $0 < (P) < 0.05$, $(E) = 0.551$,

where:

P = Process Weight Rate, tons/hour; for P001, P = 39.6 pounds/hour or 0.02 tons/hour, assuming all PE is PM₁₀; and

E = Emission rate, in pounds per hour.

Compliance with the hourly PM₁₀ and PE emission limitations is demonstrated by the following calculation representing the maximum potential PE and PM₁₀ emission rate of the emissions unit:

Maximum hourly coating usage of 39.6 pounds of coating/hour x maximum coating solids content of 0.01 pounds of solids/pound of coating x (1 – 0.45 TE) x (1 – 0.90 CE) = 0.021 pounds of solids, as maximum potential PE and PM₁₀ emissions per hour,



where:

TE = Transfer Efficiency of the sprayed resin containing the solids

CE = Control Efficiency for PM₁₀/PE of the dry filters.

(Authority for term: OAC rule 3745-17-11(B)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1))

e. Emission Limitations:

PE and PM₁₀ emissions shall not exceed 2.41 TPY.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly PE and PM₁₀ emission limitations in f)(1)d. above is demonstrated. The annual emission limitation was established based on the following calculation:

$0.551 \text{ pound PE/PM}_{10}/\text{hour} \times 8760 \text{ hours/year} \times 1 \text{ ton}/2000 \text{ pounds} = 2.41 \text{ TPY PE/PM}_{10}$

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

f. Emission Limitation:

Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-17-03(B)(1)(a))

g. Emission Limitations:

Table 3 to 40 CFR Part 63, Subpart WWWW - Organic Hazardous Air Pollutant (HAP) Emission Limits for Specific Open Molding, Centrifugal Casting, Pultrusion, and Continuous Lamination/Casting Operations shows which emission limits apply based upon the type of operation and the method of resin and coating application (see b)(2)d.). [40 CFR 63.5805(b)]



Applicable Compliance Method:

Compliance with the organic HAP emission limitations found in 40 CFR Part 63, Subpart WWWW, shall be based upon the compliance demonstration utilized by the permittee as specified in c)(2) of this permit and the record keeping specified in 40 CFR Part 63.5780-5935 and d)(3) and d)(4) of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 63, Subpart WWWW)

- (2) The permittee shall comply with the applicable compliance procedures and performance test methods as required under 40 CFR Part 63, Subpart WWWW, including the following sections:

63.5797	determination of organic HAP content in resins and gel coats
63.5798	determination of application technology
63.5840	initial compliance demonstration
63.5900(a)	continuous compliance demonstrations

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW)

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05838, issued on 9/26/2006: f)(1)a. through f)(1)g. and f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.



2. P002, gel coat operation

Operations, Property and/or Equipment Description:

Gel Coat Operation

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [PTI 14-05838, issued 9/26/2006]	OC emissions shall not exceed 2.3 pounds per hour. See b)(2)a. and b)(2)b. PM ₁₀ emissions shall not exceed 0.551 pound per hour. PE and PM ₁₀ emissions shall not exceed 2.41 TPY. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW, OAC rule 3745-17-07(A)(1), and OAC rule 3745-17-11(B)(1).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)(1) Table I	PE shall not exceed 0.551 pound per hour. See b)(2)a.
d.	OAC rules 3745-21-25(A) through (S)	The requirements of this rule for the control of VOC emissions are equivalent to the requirements established in 40 CFR Part 63, Subpart WWWW, for the



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		control of organic HAP emissions. Compliance with the emission limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW will satisfy the requirements of this rule.
e.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 5935)</p> <p>[In accordance with 40 CFR 63.5790 and 63.5795, this emissions unit may include the following open molding operations: non-atomized gel coat application, material mixing, and HAP-containing materials storage associated with open molding at a new reinforced plastic composites production facility subject to the emission limits and work practice standards specified in this section.]</p>	<p>Table 3 to 40 CFR Part 63, Subpart WWWW - Organic Hazardous Air Pollutant (HAP) Emission Limits for Specific Open Molding, Centrifugal Casting, Pultrusion, and Continuous Lamination/Casting Operations shows which emission limits apply based upon the type of operation and the method of resin and gel coat application.</p> <p>See b)(2)d. for a listing of the specific emission limitations and c)(2) for compliance demonstration options.</p> <p>Table 4 to 40 CFR Part 63, Subpart WWWW- Applicable Work Practice Standards. See b)(2)c. and c)(1).</p>
f.	<p>40 CFR Part 63.1 – 15 (40 CFR 63.5925)</p>	<p>Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.</p>

(2) Additional Terms and Conditions

- a. The hourly OC emission limitation represents the emissions unit’s Potential to Emit (PTE). Therefore, no hourly recordkeeping and/or reporting requirements are required to demonstrate compliance with this emission limit.

The hourly PM₁₀ emission limitation of 0.551 pound per hour is based upon the federally enforceable rule limitation in Table I of OAC rule 3745-17-11 for PE, assuming that all PE is PM₁₀. The PE and PM₁₀ emission limitation of 0.551 pound per hour is greater than the potential to emit (PTE) of this emissions unit based upon the maximum material application rates, transfer efficiency, and control efficiency of the gel coat operation [see f)(1)c.]. Therefore, no hourly recordkeeping and/or reporting requirements are required to demonstrate compliance with this emission limit.



Effective Date: To be entered upon final issuance

- b. OC emissions shall not exceed 20.0 TPY from emissions units P001, P002, and P003, combined.
- c. The permittee shall comply with the applicable work practice standards specified in Table 4 of 40 CFR Part 63, Subpart WWWW, including the following:
 - i. Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1.0 inch are permissible around mixer shafts and any required instrumentation;
 - ii. Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety;
 - iii. Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels;
 - iv. Containers of five gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin); and
 - v. Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
- d. The following organic HAP emission limitations shall not be exceeded, based on application technique and material properties, as specified in Table 3 of 40 CFR Part 63, Subpart WWWW:

If your operation type is . . .	And you use . . .	¹Your organic HAP emissions limit is . . .
1. open molding—corrosion-resistant and/or high strength (CR/HS)	a. mechanical resin application b. filament application c. manual resin application	113 lb/ton. 171 lb/ton. 123 lb/ton.
2. open molding—non-CR/HS	a. mechanical resin application b. filament application c. manual resin application	88 lb/ton. 188 lb/ton. 87 lb/ton.
3. open molding—tooling	a. mechanical resin application b. manual resin application	254 lb/ton. 157 lb/ton.
4. open molding—low-flame spread/low-smoke products	a. mechanical resin application b. filament application c. manual resin application	497 lb/ton. 270 lb/ton. 238 lb/ton.
5. open molding—shrinkage controlled resins ²	a. mechanical resin application b. filament application c. manual resin application	354 lb/ton. 215 lb/ton. 180 lb/ton.
6. open molding—gel coat ³	a. tooling gel coating b. white/off white pigmented gel coating c. all other pigmented gel coating	440 lb/ton. 267 lb/ton. 377 lb/ton.



Effective Date: To be entered upon final issuance

	d. CR/HS or high performance gel coat	605 lb/ton.
	e. fire retardant gel coat	854 lb/ton.
	f. clear production gel coat	522 lb/ton.

¹Organic HAP emissions limits for open molding and centrifugal casting are expressed as lb/ton. You must be at or below these values based on a 12-month rolling average.

²This emission limit applies regardless of whether the shrinkage controlled resin is used as a production resin or a tooling resin.

³If you only apply gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If you use multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, you may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.

c) Operational Restrictions

- (1) The permittee shall employ non-HAP containing cleanup solvent in this emissions unit.
 (Authority for term: 40 CFR Part 63, Subpart WWWW, OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(A)(1))
- (2) The permittee shall utilize one or more compliance options, as specified in 40 CFR 63.5810 to demonstrate compliance with the emission standards for open molding in Table 3 of this subpart, as described in the following sections:

63.5810(a)	individual resin or gel coat compliance demonstration
63.5810(b)	average individual organic HAP emissions limit compliance demonstration for all operations and application methods
63.5810(c)	weighted average emission limit compliance demonstration
63.5810(d)	organic HAP emission limit compliance demonstration for one resin type and application method

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart WWWW)

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for the coating operation in this emissions unit:
 - a. the company identification for each coating (resin and gel coat) employed;
 - b. the amount of each coating (resin and gel coat) employed, in pounds;



Effective Date: To be entered upon final issuance

- c. the organic HAP content, recorded in percent weight, of each coating (resin and gel coat);
- d. the organic HAP emissions in pounds per ton of resin or gel coat employed, calculated using the equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW; and
- e. the rolling, 12-month average organic HAP emissions limit in pounds per ton of resin or gel coat employed, using the procedures outlined in 40 CFR 63.5810.

(Authority for term: OAC rule 3745-31-05(A)(3), 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-77-07(C)(1))

- (2) The permittee shall collect and record the annual OC emissions, in tons per year, from emissions units P001, P002, and P003, combined. For P002, the annual OC emissions may constitute a summation of the monthly organic HAP emissions (assumed equal to OC emissions) calculated in d)(1) for a consecutive 12-month period.

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

- (3) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart WWWW, including the following sections:

63.5895(c) - (d)	records of resin and gel coat use, organic HAP content, operation and application method(s)
63.5915(a)	copy of compliance notification(s) and report(s)
63.5915(c)	records of all calculations and data used to determine organic HAP emissions factors or average organic HAP contents for operations and application methods as specified under 63.5810
63.5915(d)	certified statement of compliance with work practice requirements
63.5920(a) – (d)	record keeping format and retention requirements

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 63, Subpart WWWW)

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-05838, issued on 9/26/2006:d)(1) through d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. any deviation from the prohibition of the use of HAP-containing cleanup solvent;
 - b. all exceedances of the organic HAP emission limitations in pounds per ton of resin or gel coat as specified in b)(2)d.; and
 - c. any deviation from the HAP-containing material storage requirements in b)(2)c.v.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

- (2) The permittee shall submit annual reports which specify the total OC emissions from emissions units P001, P002, and P003, combined. This report shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

- (3) The permittee shall submit semi-annual reports and such other notifications and reports to the Southwest Ohio Air Quality Agency as are required in 40 CFR Part 63, Subpart WWWW, pursuant to the following sections:

63.5905(a) and Table 13	initial notification and notification of compliance status
63.5905(b)	15-day notification of change(s)
63.5910(a) - (b) and Table 14	semi-annual compliance reports
63.5910(c) - (i) and Table 14	content of semi-annual compliance reports

The semi-annual reporting requirement may be satisfied by including and identifying the information in 63.5910(c) - (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 63, Subpart WWWW)

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-05838, issued on 9/26/2006:e)(1) through e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

OC emissions shall not exceed 2.3 pounds per hour.

Applicable Compliance Method:

The OC hourly emission limitation above represents the emissions unit's potential to emit. The OC emission limitation was established based on information supplied by the permittee in the application for PTI 14-05838, issued on 9/26/2006, and Application A0044069 submitted on November 30, 2012, for Title V Operating Permit P0112137 as follows:

0.00650 ton open-molding, non-atomized gel coat mechanical application/hour x
350.00 pounds OC/ton gel coat = 2.28 pounds OC/hour

0.00010 ton open-molding, non-atomized gel coat mechanical application/hour x
40.00 pounds OC/ton gel coat = 0.004 pound OC/hour

2.28 pound OC/hour + 0.004 pound OC/hour = 2.3 pounds OC/hour

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

b. Emission Limitation:

OC emissions from emissions units P001, P002, and P003, combined, shall not exceed 20.0 TPY.

Applicable Compliance Method:

Compliance with the annual OC emission limitation from P001, P002, and P003, combined, shall be demonstrated based on the record keeping specified in d)(2).

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

c. Emission Limitations:

PM₁₀ emissions shall not exceed 0.551 pound per hour.

PE shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

The PE/PM₁₀ emission limitations represent the federally-enforceable rule limitation in Table I of OAC rule 3745-17-11(B) as follows:



For $0 < (P) < 0.05$, $(E) = 0.551$,

where:

P = Process Weight Rate, tons/hour; for P002, P = 16.25 pounds/hour or 0.008 tons/hour, assuming all PE is PM₁₀; and

E = Emission rate, in pounds per hour.

Compliance with the hourly PM₁₀ and PE emission limitations is demonstrated by the following calculation representing the maximum potential PE and PM₁₀ emission rate of the emissions unit:

Maximum hourly coating usage of 16.25 pounds of coating/hour x maximum coating solids content of 0.26 pounds of solids/pound of coating x (1 – 0.45 TE) x (1 – 0.90 CE) = 0.23 pounds of solids, as maximum potential PE and PM₁₀ emissions per hour,

where:

TE = Transfer Efficiency of the sprayed resin containing the solids

CE = Control Efficiency for PM₁₀/PE of the dry filters

(Authority for term: OAC rule 3745-17-11(B)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1))

d. Emission Limitations:

PE and PM₁₀ emissions shall not exceed 2.41 TPY.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly PE and PM₁₀ emission limitations in f)(1)c. above is demonstrated. The annual emission limitation was established based on the following calculation:

0.551 pound PE/PM₁₀/hour x 8760 hours/year x 1 ton/2000 pounds = 2.41 TPY
PE/PM₁₀

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

e. Emission Limitation:

Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.



Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3). and OAC rule 3745-17-03(B)(1)(a))

f. Emission Limitations:

Table 3 to 40 CFR Part 63, Subpart WWWW - Organic Hazardous Air Pollutant (HAP) Emission Limits for Specific Open Molding, Centrifugal Casting, Pultrusion, and Continuous Lamination/Casting Operations shows which emission limits apply based upon the type of operation and the method of resin and coating application (see b)(2)d.). [40 CFR 63.5805(b)]

Applicable Compliance Method:

Compliance with the organic HAP emission limitations found in 40 CFR Part 63, Subpart WWWW, shall be based upon the compliance demonstration utilized by the permittee as specified in c)(2) of this permit and the record keeping specified in 40 CFR Part 63.5780-5935 and d)(1) and d)(3) of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 63, Subpart WWWW)

- (2) The permittee shall comply with the applicable compliance procedures and performance test methods as required under 40 CFR Part 63, Subpart WWWW, including the following sections:

63.5797	determination of organic HAP content in resins and gel coats
63.5798	determination of application technology
63.5840	initial compliance demonstration
63.5900(a)	continuous compliance demonstrations

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW)

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05838, issued on 9/26/2006: f)(1)a. through f)(1)f., and f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the



Proposed Title V Permit

Composite Engineering LLC

Permit Number: P0112137

Facility ID: 1413010484

Effective Date: To be entered upon final issuance

testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.



3. P003, hand layup area

Operations, Property and/or Equipment Description:

Hand Layup Area

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 37431-05(A)(3) [PTI 14-05838, issued 9/26/2006]	OC emissions shall not exceed 2.5 pounds per hour. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW. See b)(2)a. and b)(2)b.
b.	OAC rules 3745-21-25(A) through (S)	The requirements of this rule for the control of VOC emissions are equivalent to the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions. Compliance with the emission limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW will satisfy the requirements of this rule.
c.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 5935) [In accordance with 40 CFR 63.5790 and 63.5795, this emissions unit may include the following open molding operations: resin hand layup application, material mixing, and HAP-containing materials storage associated with open molding at a new reinforced plastic composites production facility subject to the	Table 3 to 40 CFR Part 63, Subpart WWWW - Organic Hazardous Air Pollutant (HAP) Emission Limits for Specific Open Molding, Centrifugal Casting, Pultrusion, and Continuous Lamination/Casting Operations shows which emission limits apply based upon the type of operation and the method of resin and gel coat application. See b)(2)d. for a listing of the specific emission limitations and c)(2) for



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	emission limits and work practice standards specified in this section.]	compliance demonstration options. Table 4 to 40 CFR Part 63, Subpart WWWW- Applicable Work Practice Standards. See b)(2)c. and c)(1).
d.	40 CFR Part 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

- a. The hourly OC emission limitation represents the emissions unit’s Potential to Emit (PTE). Therefore, no hourly recordkeeping and/or reporting requirements are required to demonstrate compliance with this emission limit.
- b. OC emissions shall not exceed 20.0 TPY from emissions units P001, P002, and P003, combined.
- c. The permittee shall comply with the applicable work practice standards specified in Table 4 of 40 CFR Part 63, Subpart WWWW, including the following:
 - i. Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1.0 inch are permissible around mixer shafts and any required instrumentation;
 - ii. Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety;
 - iii. Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels;
 - iv. Containers of five gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin); and
 - v. Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
- d. The following organic HAP emission limitations shall not be exceeded, based on application technique and material properties, as specified in Table 3 of 40 CFR Part 63, Subpart WWWW:



If your operation type is . . .	And you use . . .	¹Your organic HAP emissions limit is . . .
1. open molding—corrosion-resistant and/or high strength (CR/HS)	a. mechanical resin application b. filament application c. manual resin application	113 lb/ton. 171 lb/ton. 123 lb/ton.
2. open molding—non-CR/HS	a. mechanical resin application b. filament application c. manual resin application	88 lb/ton. 188 lb/ton. 87 lb/ton.
3. open molding—tooling	a. mechanical resin application b. manual resin application	254 lb/ton. 157 lb/ton.
4. open molding—low-flame spread/low-smoke products	a. mechanical resin application b. filament application c. manual resin application	497 lb/ton. 270 lb/ton. 238 lb/ton.
5. open molding—shrinkage controlled resins ²	a. mechanical resin application b. filament application c. manual resin application	354 lb/ton. 215 lb/ton. 180 lb/ton.
6. open molding—gel coat ³	a. tooling gel coating	440 lb/ton.
	b. white/off white pigmented gel coating	267 lb/ton.
	c. all other pigmented gel coating	377 lb/ton.
	d. CR/HS or high performance gel coat	605 lb/ton.
	e. fire retardant gel coat	854 lb/ton.
	f. clear production gel coat	522 lb/ton.

¹Organic HAP emissions limits for open molding and centrifugal casting are expressed as lb/ton. You must be at or below these values based on a 12-month rolling average.

²This emission limit applies regardless of whether the shrinkage controlled resin is used as a production resin or a tooling resin.

³If you only apply gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If you use multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, you may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.

c) Operational Restrictions

- (1) The permittee shall employ non-HAP containing cleanup solvent in this emissions unit.
 (Authority for term: OAC rule 3745-31-05(A)(3), 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-77-07(A)(1))
- (2) The permittee shall utilize one or more compliance options, as specified in 40 CFR 63.5810 to demonstrate compliance with the emission standards for open molding in Table 3 of this subpart, as described in the following sections:



63.5810(a)	individual resin or gel coat compliance demonstration
63.5810(b)	average individual organic HAP emissions limit compliance demonstration for all operations and application methods
63.5810(c)	weighted average emission limit compliance demonstration
63.5810(d)	organic HAP emission limit compliance demonstration for one resin type and application method

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart WWWW)

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for the coating operation in this emissions unit:
 - a. the company identification for each coating (resin and gel coat) employed;
 - b. the amount of each coating (resin and gel coat) employed, in pounds;
 - c. the organic HAP content, recorded in percent weight, of each coating (resin and gel coat);
 - d. the organic HAP emissions in pounds per ton of resin or gel coat employed, calculated using the equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW; and
 - e. the rolling, 12-month average organic HAP emissions limit in pounds per ton of resin or gel coat employed, using the procedures outlined in 40 CFR 63.5810.

(Authority for term: OAC rule 3745-31-05(A)(3), 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-77-07(C)(1))

- (2) The permittee shall collect and record the annual OC emissions, in tons per year, from emissions units P001, P002, and P003, combined. For P003, the annual OC emissions may constitute a summation of the monthly organic HAP emissions (assumed equal to OC emissions) calculated in d)(1) for a consecutive 12-month period.

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

- (3) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart WWWW, including the following sections:



63.5895(c) - (d)	records of resin and gel coat use, organic HAP content, operation and application method(s)
63.5915(a)	copy of compliance notification(s) and report(s)
63.5915(c)	records of all calculations and data used to determine organic HAP emissions factors or average organic HAP contents for operations and application methods as specified under 63.5810
63.5915(d)	certified statement of compliance with work practice requirements
63.5920(a) – (d)	record keeping format and retention requirements

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 63, Subpart WWWW)

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-05838, issued on 9/26/2006:d)(1) through d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. any deviation from the prohibition of the use of HAP-containing cleanup solvent;
 - b. all exceedances of the organic HAP emission limitations in pounds per ton of resin or gel coat as specified in b)(2)d.; and
 - c. any deviation from the HAP-containing material storage requirements in b)(2)c.v.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

- (2) The permittee shall submit annual reports which specify the total OC emissions from emissions units P001, P002, and P003, combined. This report shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))



- (3) The permittee shall submit semi-annual reports and such other notifications and reports to the Southwest Ohio Air Quality Agency as are required in 40 CFR Part 63, Subpart WWWW, pursuant to the following sections:

63.5905(a) and Table 13	initial notification and notification of compliance status
63.5905(b)	15-day notification of change(s)
63.5910(a) - (b) and Table 14	semi-annual compliance reports
63.5910(c) - (i) and Table 14	content of semi-annual compliance reports

The semi-annual reporting requirement may be satisfied by including and identifying the information in 63.5910(c) - (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 63, Subpart WWWW)

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-05838, issued on 9/26/2006:e)(1) through e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

OC emissions shall not exceed 2.5 pounds per hour.

Applicable Compliance Method:

The OC hourly emission limitation above represents the emissions unit's potential to emit. The OC emission limitation was established based on information supplied by the permittee in the application for PTI 14-05838, issued on 9/26/2006, and Application A0044069 submitted on November 30, 2012, for Title V Operating Permit P0112137 as follows:

0.01 ton open-molding, resin hand layup application/hour x 86.00 pounds OC/ton resin = 0.86 pound OC/hour

0.01 tons open-molding, resin hand layup application/hour x 163.00 pounds OC/ton resin = 1.63 pounds OC/hour



Effective Date: To be entered upon final issuance

0.00030 ton open-molding, non-atomized gel coat mechanical application/hour x
40.00 pounds OC/ton gel coat = 0.012 pound OC/hour

0.86 pound OC/hour + 1.63 pounds OC/hour + 0.012 pound OC/hour = 2.5
pounds VOC/hour

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

b. Emission Limitation:

OC emissions from emissions units P001, P002, and P003, combined, shall not
exceed 20.0 TPY.

Applicable Compliance Method:

Compliance with the annual OC emission limitation from P001, P002, and P003,
combined, shall be demonstrated based upon the record keeping specified in
d)(2).

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

c. Emission Limitations:

Table 3 to 40 CFR Part 63, Subpart WWWW - Organic Hazardous Air Pollutant
(HAP) Emission Limits for Specific Open Molding, Centrifugal Casting,
Pultrusion, and Continuous Lamination/Casting Operations shows which
emission limits apply based upon the type of operation and the method of resin
and coating application (see b)(2)d.). [40 CFR 63.5805(b)]

Applicable Compliance Method:

Compliance with the organic HAP emission limitations found in 40 CFR Part 63,
Subpart WWWW, shall be based upon the compliance demonstration utilized by
the permittee as specified in c)(2) of this permit and the record keeping specified
in 40 CFR Part 63.5780-5935 and d)(1) and d)(3) of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and
40 CFR Part 63, Subpart WWWW)

- (2) The permittee shall comply with the applicable compliance procedures and performance
test methods as required under 40 CFR Part 63, Subpart WWWW, including the
following sections:

63.5797	determination of organic HAP content in resins and gel coats
63.5798	determination of application technology
63.5840	initial compliance demonstration



Proposed Title V Permit

Composite Engineering LLC

Permit Number: P0112137

Facility ID: 1413010484

Effective Date: To be entered upon final issuance

63.5900(a)	continuous compliance demonstrations
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(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW)

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05838, issued on 9/26/2006: f)(1)a. through f)(1)c. and f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.