



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

6/11/2013

Certified Mail

Mr. Chad Pulliam
Perry Fiberglass Products Inc
33660 Pin Oak Parkway
Avon Lake, OH 44012

Facility ID: 0247030996
Permit Number: P0106421
County: Lorain

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Initial

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Chronicle Telegram. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. 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. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-NEDO

PUBLIC NOTICE
6/11/2013 Issuance of Draft Air Pollution Title V Permit

Perry Fiberglass Products Inc
33660 Pin Oak Parkway,
Avon Lake, OH 44012
Lorain County

FACILITY DESC.: All Other Plastics Product Manufacturing

PERMIT #: P0106421

PERMIT TYPE: Initial

PERMIT DESC: Initial Title V permit for fiberglass reinforced plastic duct manufacturing

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Anthony Becker, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171



Statement of Basis
 Perry Fiberglass Products Inc
Permit Number: P0106421
Facility ID: 0247030996

Statement of Basis For Air Pollution Title V Permit

Facility ID:	0247030996
Facility Name:	Perry Fiberglass Products Inc
Facility Description:	Fiberglass reinforced plastic duct manufacturing
Facility Address:	33660 Pin Oak Parkway, Avon Lake, OH 44012
Permit #:	P0106421, Initial
This facility is subject to Title V because it is major for: <input type="checkbox"/> Lead <input type="checkbox"/> Sulfur Dioxide <input type="checkbox"/> Carbon Monoxide <input type="checkbox"/> Volatile Organic Compounds <input type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> Particulate Matter ≤ 10 microns <input checked="" type="checkbox"/> Single Hazardous Air Pollutant <input checked="" type="checkbox"/> Combined Hazardous Air Pollutants <input checked="" type="checkbox"/> Maximum Available Control Technology Standard(s) <input type="checkbox"/> GHG <input type="checkbox"/> Title IV	

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A



Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	N/A

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.1			Lists facility-wide terms and conditions that are enforceable under state law only.
B.2		40 CFR Part 63 Subpart WWWW	States applicability of 40 CFR, Part 63, Subpart WWWW for the facility
B.3		40 CFR Part 63 Subpart WWWW, Table 4	work practice standards: keep all containers that store HAP-containing materials closed or covered
B.4		40 CFR Part 63 Subpart WWWW	Other – 40 CFR Part 63 Subpart WWWW Reporting requirements for facility-wide work practice standard



B.5		40 CFR Part 63 Subpart WWWW	Notifications, semi-annual report, records retention
B.6	21-25		States applicability of OAC rule 3745-21-25 for the facility
B.7	21-25		work practice standard:Table 1 keep all containers that store HAP-containing materials closed or covered
B.8	21-25		work practice standard:Table 1 keep all containers that store HAP-containing materials closed or covered
B.9	21-25		initial notification – statement of facility-wide emissions
B.10	21-25		VOC emission limitations for facility-wide uncontrolled VOC emissions equal to greater than 100 tons per year
B.11	21-25		Monitoring requirements for facility-wide uncontrolled VOC emissions
B.12	21-25		Reporting requirements for facility-wide uncontrolled VOC emissions threshold:
B.13	21-25		Compliance date for facility-wide uncontrolled VOC emissions over the threshold of 100 tons per year
B.14	21-25		Notifications, semi-annual report, records retention

C. Emissions Unit Terms and Conditions

Key:
 EU = emissions unit ID
 ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)
 OR = operational restriction
 M = monitoring requirements
 ENF = did noncompliance issues drive the monitoring requirements?
 R = record keeping requirements
 Rp = reporting requirements
 ET = emission testing requirements (not including compliance method terms)
 St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
 Misc = miscellaneous requirements

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P001, P002	Applicable Table 3 organic HAP limits		40 CFR Part 63 Subpart WWWW, Table 3	N	N	Y	N	Y	Y	N	N	N	ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required.



P001, P002	Applicable Table 2 VOC limits	21-25(D)(2)		N	N	Y	N	Y	Y	N	N	N	ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required.
P001, P002	Applicable Table 2 VOC limits and applicable Table 3 organic HAP limits	ORC 3704.03(T)		N	N	Y	N	Y	Y	N	N	N	ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required.
P005	OC: 46 tons/yr		ORC 3704.03(T).	N	Y	Y	N	Y	Y	N	N	N	OR –cleanup material shall not contain HAP or VOC. ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required.
P005	Do not use cleaning solvents (cleaners) that have VOC content greater than 0.42 pound VOC per gallon, except cleaners used in closed systems and used to clean cured resin from application equipment.	21-25(D)(1)		N	N	Y	N	Y	Y	N	N	N	ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required. OR – work practice standards: Mixer cover shall have no visible gap in it, except 1” around the shaft; close vents when actual mixing; and keep mixer cover closed when actual mixing.



	Application equipment includes any equipment that directly contacts resin.												
P005	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.	N	40 CFR Part 63 Subpart WWWW, Table 4	N	Y	Y	N	N	Y	N	Y	N	ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required.



Statement of Basis
 Perry Fiberglass Products Inc
Permit Number: P0106421
Facility ID: 0247030996

R001 – R007	VOC:1,216 lbs/month and 7.3 tons/yr	31-05(A)(3)	Y	N	N	Y	N	Y	Y	N	N	N	ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required.
R001 – R007	Applicable Table 3 organic HAP limits		40 CFR Part 63 Subpart WWWW, Table 3	N	N	Y	N	Y	Y	N	N	N	ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required.
R001 – R007	Applicable Table 2 VOC limits	21-25(D)(2)		N	N	Y	N	Y	Y	N	N	N	ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required.
P001, P002, P005, R001 – R007			40 CFR Part 63.1-15	N	N	Y	N	Y	Y	N	N	N	40 CFR Part 63.1-15 The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW. ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required.



DRAFT

Division of Air Pollution Control
Title V Permit
for
Perry Fiberglass Products Inc

Facility ID:	0247030996
Permit Number:	P0106421
Permit Type:	Initial
Issued:	6/11/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Perry Fiberglass Products Inc

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Draft Title V Permit
Perry Fiberglass Products Inc
Permit Number: P0106421
Facility ID: 0247030996

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0247030996
Facility Description: Fiberglass reinforced plastic duct manufacturing
Application Number(s): A0039632, A0047010
Permit Number: P0106421
Permit Description: Initial Title V permit for fiberglass reinforced plastic duct manufacturing
Permit Type: Initial
Issue Date: 6/11/2013
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number:

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

Perry Fiberglass Products Inc
33660 Pin Oak Parkway
Avon Lake, OH 44012

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

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 Ohio EPA DAPC, Northeast District Office. 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



Draft Title V Permit
Perry Fiberglass Products Inc
Permit Number: P0106421
Facility ID: 0247030996
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 Ohio EPA DAPC, Northeast District Office.

(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.



Draft Title V Permit
Perry Fiberglass Products Inc
Permit Number: P0106421
Facility ID: 0247030996
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Effective Date: To be entered upon final issuance

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 emissions units as well as containers storing HAP-containing materials are subject to 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production. The complete MACT requirements, including the MACT 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.

EU ID	Operations, Property and/or Equipment Description
P001	Filament Winder No. 1
P002	Filament Winder No. 2
P005	Facility-wide cleanup
R001	Open molding area No. 1
R002	Open molding area No. 2
R003	Open molding area No. 3
R004	Open molding area No. 4
R005	Open molding area No. 5
R006	Open molding area No. 6
R007	Open molding area No. 7

The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart WWWW. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 15 of 40 CFR Part 63, Subpart WWWW. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart WWWW, and Subpart A.

[Authority for term: 40 CFR, Part 63, Subpart WWWW]

3. 40 CFR, Part 63, Subpart WWWW – Operational Restriction for the facility-wide work practice standard:

a) For all fiberglass reinforced plastic operations, the permittee must keep all 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.

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

4. 40 CFR, Part 63, Subpart WWWW – Reporting Requirements for facility-wide work practice standard:

a) The permittee must submit the following semiannual compliance reports:

(1) if there are no deviations from this work practice standard in B.3.a), provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., all containers that store HAP-containing materials were closed or covered during the reporting period); and



Effective Date: To be entered upon final issuance

- (2) if there were deviations with this work practice standard in B.3.a), provide the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

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

5. **The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart WWWW, including the following sections:**

63.5915(a)	copy of compliance notification(s) and report(s)
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) and 40 CFR Part 63, Subpart WWWW]

6. **The following emissions units as well as containers storing HAP-containing materials are subject to OAC rule 3745-21-25. Compliance with all applicable requirements shall be achieved by the dates set forth in OAC rule 3745-21-25.**

EU ID	Operations, Property and/or Equipment Description
P001	Filament Winder No. 1
P002	Filament Winder No. 2
P005	Facility-wide cleanup
R001	Open molding area No. 1
R002	Open molding area No. 2
R003	Open molding area No. 3
R004	Open molding area No. 4
R005	Open molding area No. 5
R006	Open molding area No. 6
R007	Open molding area No. 7

[Authority for term: OAC rule 3745-21-25]

7. **OAC rule 3745-21-25 – Operational Restriction for the facility-wide work practice standard:**

- a) For all fiberglass reinforced plastic operations, the permittee must keep all containers that store VOC-containing materials closed or covered except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-21-25]



8. OAC rule 3745-21-25 – Reporting Requirements for facility-wide work practice standard:

a) The permittee must submit the following semiannual compliance reports:

- (1) if there are no deviations from the work practice standard in B.7.a), provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., all containers that store VOC-containing materials were closed or covered during the reporting period); and
- (2) if there were deviations with the work practice standard in B.7.a), provide the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

9. OAC rule 3745-21-25 – Combination of facility-wide uncontrolled VOC emissions:

The permittee has reported in their initial notification for this rule that VOC emissions were less than the threshold of one hundred tons of VOC per year prior to any add-on control device from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing.

[Authority for term: OAC rule 3745-21-25]

10. OAC rule 3745-21-25 – VOC emission limitations for facility-wide uncontrolled VOC emissions equal to or greater than 100 tons per year:

a) If the reinforced plastic composites production facility has VOC emissions equal to or greater than the threshold of one hundred tons of VOC per year from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, the owner or operator shall reduce the total VOC emissions from these operations by at least ninety-five per cent by weight. As an alternative to meeting ninety-five per cent by weight, the owner or operator may meet the VOC emissions limits in table 3 of this rule. A facility's VOC emissions threshold shall be calculated in accordance with paragraph (F) of this rule.

Once the facility equals or exceeds the one hundred (100) tons of VOC per year threshold of OAC rule 3745-21-25(D)(3), it is always subject to the requirements of the OAC rule 3745-21-25(D)(3).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]



11. **OAC rule 3745-21-25 –Monitoring Requirements for facility-wide uncontrolled VOC emissions:**
- a) The permittee shall calculate, on a semiannual basis, a 12-month summation of tons of VOC emissions, prior to any add-on control device, from the following operations: open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing. The permittee shall calculate the facility's VOC emissions threshold using procedures in OAC rule 3745-21-25(F).
- The calculated VOC emissions shall cover the 12-month period prior to June 30 and the 12-month period prior to December 31.
- [Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]
12. **OAC rule 3745-21-25 –Reporting Requirements for facility-wide uncontrolled VOC emissions threshold:**
- a) The permittee shall report if the facility's actual VOC emissions met or exceeded the actual emissions threshold of one hundred tons of VOC emissions per year (VOC emissions prior to any add-on control device), as calculated in B.11.a), and if the amount of VOC emissions would make the facility subject to paragraph (D)(3) of OAC rule 3745-21-25. The report shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by whichever date comes first after the facility's determination that it met or exceeded the VOC threshold: July 31 or January 31.
- In the event a reinforced plastic composites production facility equals or exceeds the one hundred tons of VOC per year threshold of paragraph (D)(3) of this rule on or after December 14, 2009, but reduces its emissions to less than the one hundred tons of VOC per year threshold by no later than the compliance date of this rule, the facility is not subject to the requirements of paragraphs (D)(3) of this rule. If such reinforced plastic composites production facility subsequently equals or exceeds the one hundred tons of VOC per year threshold of paragraph (D)(3) of this rule, then it becomes subject to the requirements of paragraph (D)(3) of this rule.
- [Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]
13. **OAC rule 3745-21-25 –Compliance date for facility-wide uncontrolled VOC emissions over the threshold of 100 tons per year:**
- a) If the facility has actual uncontrolled VOC emissions less than the threshold of one hundred tons of VOC per year from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, and the facility subsequently increases its actual uncontrolled VOC emissions to meet or exceed the threshold of one hundred tons of VOC per year from the combination of such operations, the compliance date of any affected operation pertaining to a new VOC emission requirement is two years from the date that the semiannual compliance report indicates the facility meets or exceeds the threshold of one hundred tons of VOC per year.
- [Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]



14. **The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25, including the following sections:**

OAC rule 3745-21-25(P)(1)(a)	The owner or operator shall keep the following records: a copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status
OAC rule 3745-21-25(P)(1)(c)	The owner or operator shall keep the following records: for operations listed in tables 2, 3, and 4 of this rule, all data, assumptions, and calculations used to determine monomer contents and VOC emissions factors.
OAC rule 3745-21-25(P)(1)(e)	The owner or operator shall keep the following records: a certified statement that operations are in compliance with the work practice standards specified in Table 1 of OAC rule 3745-21-25, as applicable.
OAC rule 3745-21-25(P)(4)	record keeping retention requirements, retained all records for a period five years

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]



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Perry Fiberglass Products Inc
Permit Number: P0106421
Facility ID: 0247030996
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P005, Facility-wide cleanup

Operations, Property and/or Equipment Description:

Facility-wide cleanup

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: P0114410	No applicable requirements.
b.	OAC rule 3745-21-07(M)(5)(a) For cleanup only	Exempt from the emission limit standards in OAC rule 3745-21-07(M)(2).
c.	OAC rule 3745-21-25(D)(1) For cleanup only	Work practice standards in Table 1 of OAC rule 3745-21-25: Do not use cleaning solvents (cleaners) that have VOC content greater than 0.42 pound VOC per gallon, except cleaners used in closed systems and used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. See b)(2)a for operations excluded from this rule. See b)(2)b for definition for "cleaning" from this rule.
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935) For cleanup only	Work practice standards in Table 4 of Subpart WWWW: The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.</p> <p>The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>See b)(2)a for operations excluded from the rule. See b)(2)b for definition for "cleaning" from this rule.</p>
e.	40 CFR Part 63.1 – 63.15 For cleanup only	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

- a. The following operations and materials are specifically excluded from any requirements in this rule:
 - i. application of mold sealing and release agents; and
 - ii. mold stripping and cleaning.
- b. "Cleaning" means removal of composite materials, such as cured and uncured resin from equipment, finished surfaces, floors, hands of employees, or any other surfaces.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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

63.5915(a)	copy of compliance notification(s) and report(s)
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) and 40 CFR Part 63, Subpart WWWW]



- (2) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25, including the following sections:

OAC rule 3745-21-25(P)(1)(a)	a copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status
OAC rule 3745-21-25(P)(1)(e)	a certified statement that operations are in compliance with the work practice standards specified in Table 1 of OAC rule 3745-21-25, as applicable.
OAC rule 3745-21-25(P)(4)	record keeping retention requirements

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

- (3) The permittee shall maintain monthly records for this emissions unit:
- a. the name and identification number of each cleanup material used;
 - b. an identification of each cleanup material used that contains VOC and/or HAP;
 - c. density and VOC/HAP weight fraction of each cleanup material used, or density and OC volume fraction of each cleanup applied;
 - d. weight or volume of each cleanup material used;
 - e. VOC/HAP emission rate for all cleanup materials used, in lbs/month;
 - f. If a credit for recovered cleanup materials is to be used to demonstrate compliance, records of the total amount (lbs) of cleanup material collected and added to the recovery container, for recycle, recovery, and/or disposal at an outside facility, shall be maintained in the following manner:
 - i. the date the materials from the recovery container were shipped off site; and
 - ii. the number of gallons or pounds of materials from the recovery container shipped off site; and
 - g. A credit of recovered cleanup materials may be used to adjust to amount of VOC/HAP emissions in section d)(3)e.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI: P0114410]



e) Reporting Requirements

(1) The permittee must submit semiannual compliance reports:

- a. if there are no deviations from the work practice standard in b)(1)c, provide a statement that there were no deviations from the work practice standard during the reporting period (i.e., each cleaning solvent used did not have a VOC content greater than 0.42 pound VOC per gallon (except cleaners used in closed systems and used to clean cured resin from application equipment) for the reporting period);
- b. if there are no deviations from the work practice standard in b)(1)d, provide a statement that there were no deviations from the work practice standard during the reporting period (i.e., cleaning solvents used did not contain HAP, except that styrene was used as a cleaner in closed systems, and organic HAP containing cleaners was used to clean cured resin from application equipment, for the reporting period); and
- c. if there were deviations with the work practice standards in b)(1)c and b)(1)d, provide the total operating time of the emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW and OAC rule 3745-21-25(D)(1)]

- (2) The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI: P0114410]

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. None.

g) Miscellaneous Requirements

- (1) None.



2. Emissions Unit Group -Filament Winders: P001, P002

EU ID	Operations, Property and/or Equipment Description
P001	Filament Winder 1
P002	Filament Winder 2

- 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.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Organic hazardous air pollutants (HAP) shall not exceed emissions standards as specified in 40 CFR 63.5805, Subpart WWWW. See b)(2)a, Table 3 of 40 CFR Part 63, Subpart WWWW.
b.	40 CFR Part 63.1 – 63.15 (40 CFR 63.5925)	Table 15 to Subpart WWWW – Applicability of General Provisions, Subpart A.
c.	OAC rule 3745-21-25(D)	Volatile organic compounds (VOC) emissions shall not exceed emissions standards as specified in OAC rule 3745-21-25(D)(2). See b)(2)b, Table 2 of OAC rule 3745-21-25.
d.	ORC 3704.03(T) PTI: P0113379	The emission limitations established under this rule are equivalent to the emission standards pursuant to Table 3 of 40 CFR Part 63, Subpart WWWW and Table 2 of OAC rule 3745-21-25.



(2) Additional Terms and Conditions

a. The permittee shall not exceed the following organic HAP emission limitations.

40 CFR 63.5805, Subpart WWWW		Table 3
Type of operation	Resin application method or gel coat type	Organic HAP limit ¹
1. open molding: corrosion-resistant and/or high strength(CR/HS)	a. mechanical resistant application	113 lb/ton.
	b. filament application	171 lb/ton.
	c. manual resin application	123 lb/ton.
2. open molding: non-CR/HS	a. mechanical resin application	88 lb/ton.
	b. filament application	188 lb/ton.
	c. manual resin application	87 lb/ton.
3. open molding: tooling	a. mechanical resin application	254 lb/ton.
	b. manual resin application	157 lb/ton.
4. open molding: low-flame spread/ low-smoke products	a. mechanical resin application	497 lb/ton.
	b. filament application	270 lb/ton.
	c. manual resin application	238 lb/ton.
5. open molding: shrinkage controlled resins ²	a. mechanical resin application	354 lb/ton.
	b. filament application	215 lb/ton.
	c. manual resin application	180 lb/ton.
6. open molding: gel coat ³	a. tooling gel coat	440 lb/ton.
	b. white/off white pigmented gel coat	267 lb/ton.
	c. all other pigmented gel coat	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 twelve-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.



b. The permittee shall not exceed the following VOC emission limitations.

OAC rule 3745-21-25(D)(2) For VOC threshold less than 100 tons		Table 2
Type of operation	Resin application method or gel coat type	VOC limit ¹
1. open molding: corrosion-resistant and/or high strength (CR/HS)	a. mechanical resistant 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 coat b. white/off white pigmented gel coat c. all other pigmented gel coat d. CR/HS or high performance gel coat e. fire retardant gel coat f. clear production gel coat	440 lb/ton. 267 lb/ton. 377 lb/ton. 605 lb/ton. 854 lb/ton. 522 lb/ton.

¹VOC emissions limits for open molding and centrifugal casting are expressed as pounds of VOC per ton of resin or gel coat (pounds per ton). The operation shall be at or below these values based on a twelve-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 applying 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 using multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, the owner or operator 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) None.



d) Monitoring and/or Recordkeeping Requirements

- (1) 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, as applied, emissions limit
63.5810(b)	on average, the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type
63.5810(c)	weighted average emission limit
63.5810(d)	organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.5810 and PTI: P0113379]

- (2) The permittee is currently demonstrating compliance through the option specified in 63.5810(b). The permittee shall comply with the following data collection, emission calculation, and record keeping requirements, in addition to those listed in d)(3) below:

- a. Group the process streams described in paragraph (a) of section 63.5810 by operation type and resin application method or gel coat type listed in Table 3 to this subpart and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months. To do this, sum the product of each individual organic HAP emissions factor calculated in paragraph (a)(1) of section 63.5810 and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in Equation 2 of section 63.5810.

$$\text{Average organic HAP emissions factor} = \frac{\sum_{i=1}^n (\text{Actual Process Stream EF}(i) * \text{Material}(i))}{\sum_{i=1}^n \text{Material}(i)}$$

Where:

Actual Process Stream EF (i) = actual organic HAP emissions factor for process stream (i), lbs/ton;

Material (i) = neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream (i), tons;

n=number of process streams where you calculated an organic HAP emissions factor.

- b. You may, but are not required to, include process streams where you have demonstrated compliance as described in paragraph (a) of section 63.5810, subject to the limitations described in paragraph (a)(2) of section 63.5810, and you are not required to and should not include process streams for which you will



demonstrate compliance using the procedures in paragraph (d) of section 63.5810.

- c. Compare each organic HAP emissions factor calculated in paragraph (b)(1) of section 63.5810 with its corresponding organic HAP emissions limit in Table 3 or 5 to this subpart. If all emissions factors are equal to or less than their corresponding emission limits, then you are in compliance.

Should the permittee choose to demonstrate compliance with the emission limitations listed in b)(2)a by one of the alternative compliance demonstrations specified in d)(1), the permittee shall collect and record the information specified in 40 CFR 63.5810(a),(c), or (d), as appropriate.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.5810 and PTI: P0113379]

- (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 and operation where resin is used resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission as defined in paragraph (a) of section 63.5810. However, you must retain the records of resin and gel coat organic HAP content, and you must include the list of these resins and gel coats and identify their application methods in your semiannual compliance reports.
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
63.5920(a) – (d)	record keeping format and retention requirements

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

- (4) The permittee shall utilize one or more compliance options, as specified in OAC rule 3745-21-25(G) to demonstrate compliance with the emission standards for open molding in Table 2 of this rule, as described in the following sections:

OAC rule 3745-21-25(G)(1)	individual resin or gel coat, as applied, emissions limit
OAC rule 3745-21-25(G)(2)	on average, the individual VOC emissions limits for each unique combination of operation type and resin application method or gel coat type
OAC rule 3745-21-25(G)(3)	weighted average VOC emission limit



OAC rule 3745-21-25(G)(4)	VOC emissions limit for one application method and use the same resin(s) for all application methods of that resin type
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[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25(G)]

(5) The permittee is currently demonstrating compliance through the option specified in OAC rule 3745-21-25(G)(2). The permittee shall comply with the following data collection, emission calculation, and record keeping requirements, in addition to those listed in d)(6) below:

- a. Group the process streams described in paragraph (G)(1) of this rule by operation type and resin application method or gel coat type listed in table 2 of this rule and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last twelve months. To do this, sum the product of each individual VOC emissions factor calculated in paragraph (G)(1)(a) of this rule and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in the following equation:

$$\text{Average VOC emissions factor} = \frac{\sum_{i=1}^n (\text{Actual Process Stream } EF(i) * \text{Material}(i))}{\sum_{i=1}^n \text{Material}(i)}$$

where:

Actual Process Stream EF (i) = actual VOC emissions factor for process stream (i), pounds of VOC per ton of neat resin plus or neat gel coat plus.

Material (i) = the amount of neat resin plus or neat gel coat plus used during the last twelve calendar months for process stream (i), tons.

n = number of process streams where the owner or operator calculated a VOC emissions factor.

- b. The owner or operator may, but is not required to, include process streams where the owner or operator has demonstrated compliance as described in paragraph (G)(1) of this rule, subject to the limitations described in paragraph (G)(1)(b) of this rule, and the owner or operator is not required to and should not include process streams for which the owner or operator will demonstrate compliance using the procedures in paragraph (G)(4) of this rule.
- c. Compare each VOC emissions factor calculated in paragraph (G)(2)(a) of this rule with its corresponding VOC emissions limit in table 2 or table 3 of this rule. If all emissions factors are equal to or less than their corresponding emission limits, then the operation is in compliance.



Should the permittee choose to demonstrate compliance with the emission limitations listed in b)(2)b by one of the alternative compliance demonstrations specified in d)(4), the permittee shall collect and record the information specified in OAC rule 3745-21-25(G)(1), (3), or (4), as appropriate.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

- (6) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25, including the following sections:

OAC rule 3745-21-25(O)(b)	records of resin and gel coat use, monomer content and operation where resin is used
OAC rule 3745-21-25(O)(c)	resins and gel coats use are not required, when demonstrating compliance with (G)(1) limits, as applied, but include a list of resins and gel coats and identify their application methods in the semiannual compliance reports
OAC rule 3745-21-25(P)(1)(a)	a copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status
OAC rule 3745-21-25(P)(1)(c)	for operations listed in Tables 2, 3, and 4 of OAC rule 3745-21-25 all data, assumptions, and calculations used to determine monomer contents and VOC emissions factors
OAC rule 3745-21-25(P)(4)	record keeping retention requirements

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

- (7) The permittee shall maintain the following monthly records for each emissions unit:
- a. the identification of each resin/gelcoat applied;
 - b. weight of each resin/gelcoat applied (a ton of resin/gelcoat is before the additions of additives such as powders, fillers, glass...etc., but includes additional monomer added to resin);
 - c. the percent of VOC monomer(s), by weight, (e.g., styrene and methyl methacrylate) of each resin/gelcoat applied; and
 - d. the total VOC emission rate for all resins/gelcoats applied, as calculated by the following equation, in pounds per month:

$$\text{VOC (lbs/month)} = \text{EF} \sum_i^n [W]_i$$



where:

W = weight of each resin or gelcoat, i, applied (a ton of resin or gelcoat is before the additions of additives such as powders, fillers, glass...etc, but include monomer additions), as recorded in d)(7)b;

i = a specific resin or gelcoat applied during the month;

n = total number of resins and gelcoats applied during the month; and

EF = emissions factor(s):

EF = applicable emissions factor(s) from Table 1 of Subpart WWWW of 40 CFR 63.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25 and PTI: P0113379]

e) Reporting Requirements

- (1) The permittee shall submit semi-annual reports and such other notifications and reports to the Director (the Ohio EPA eBusiness Center, Air Services) as are required in 40 CFR Part 63, Subpart WWWW, pursuant to the following sections:

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
63.5895(d)	list individual resins and gelcoats and application methods in semi-annual compliance reports

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

- (2) The permittee shall submit semi-annual reports and such other notifications and reports to the Director (the Ohio EPA eBusiness Center, Air Services) as are required in OAC rule 3745-21-25, pursuant to the following sections:

OAC rule 3745-21-25(Q)(1) – (Q)(2)	semi-annual compliance reports
OAC rule 3745-21-25 (Q)(3)(a) – (Q)(3)(h)	content of semi-annual compliance reports
OAC rule 3745-21-25(O)(2)(c)	list individual resins and gelcoats and application methods in semi-annual compliance reports

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]



- (3) The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI: P0113379]

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:

(40 CFR 63.5805, Subpart WWWW, Table 3)
Organic HAP emission limitations in b)(2)a.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1), d)(2) and d)(3) of these terms and conditions.

[Authority for term: OAC rules 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW and PTI: P0113379]

b. Emission Limitation:

(OAC rule 3745-21-25(D)(2), Table 2)
VOC emission limitations in b)(2)b.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(4), d)(5) and d)(6) of these terms and conditions.

[Authority for term: OAC rules 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW and PTI: P0113379]

g) Miscellaneous Requirements

- (1) None.



3. Emissions Unit Group -Open Molding: R001, R002, R003, R004, R005, R006, R007

EU ID	Operations, Property and/or Equipment Description
R001	Open molding area No. 1
R002	Open molding area No. 2
R003	Open molding area No. 3
R004	Open molding area No. 4
R005	Open molding area No. 5
R006	Open molding area No. 6
R007	Open molding area No. 7

- 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.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Organic hazardous air pollutants (HAP) shall not exceed emissions standards as specified in 40 CFR 63.5805, Subpart WWWW. See b)(2)a, Table 3 of 40 CFR Part 63, Subpart WWWW.
b.	40 CFR Part 63.1 – 63.15 (40 CFR 63.5925)	Table 15 to Subpart WWWW – Applicability of General Provisions, Subpart A.
c.	OAC rule 3745-21-25(D)	Volatile organic compounds (VOC) emissions shall not exceed emissions standards as specified in OAC rule 3745-21-25(D)(2). See b)(2)b, Table 2 of OAC rule 3745-21-25.
d.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 PTIs: P0114467, P0114410 and P0114561	Volatile organic compounds (VOC) shall not exceed the 1,216 lbs/month and 7.3 tons/yr. See b)(2)c.



Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 PTIs: P0114467, P0114410 and P0114561	See b)(2)d.

(2) Additional Terms and Conditions

a. The permittee shall not exceed the following organic HAP emission limitations.

40 CFR 63.5805, Subpart WWWW		Table 3
Type of operation	Resin application method or gel coat type	Organic HAP limit ¹
1. open molding: corrosion-resistant and/or high strength (CR/HS)	a. mechanical resistant 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 coat b. white/off white pigmented gel coat c. all other pigmented gel coat d. CR/HS or high performance gel coat e. fire retardant gel coat f. clear production gel coat	440 lb/ton. 267 lb/ton. 377 lb/ton. 605 lb/ton. 854 lb/ton. 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 twelve-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.



- b. The permittee shall not exceed the following VOC emission limitations.

OAC rule 3745-21-25(D)(2) For VOC threshold less than 100 tons		Table 2
Type of operation	Resin application method or gel coat type	VOC limit ¹
1. open molding: corrosion-resistant and/or high strength (CR/HS)	a. mechanical resistant 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 coat b. white/off white pigmented gel coat c. all other pigmented gel coat d. CR/HS or high performance gel coat e. fire retardant gel coat f. clear production gel coat	440 lb/ton. 267 lb/ton. 377 lb/ton. 605 lb/ton. 854 lb/ton. 522 lb/ton.

¹VOC emissions limits for open molding and centrifugal casting are expressed as pounds of VOC per ton of resin or gel coat (pounds per ton). The operation shall be at or below these values based on a twelve-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 applying 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 using multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, the owner or operator 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. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the



revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limitations/control measures no longer apply.

- d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/year.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) 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, as applied, emissions limit
63.5810(b)	on average, the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type
63.5810(c)	weighted average emission limit
63.5810(d)	organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.5810]

- (2) The permittee is currently demonstrating compliance through the option specified in 63.5810(b). The permittee shall comply with the following data collection, emission calculation, and record keeping requirements, in addition to those listed in d)(3) below:

- a. Group the process streams described in paragraph (a) of section 63.5810 by operation type and resin application method or gel coat type listed in Table 3 to this subpart and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months. To do this, sum the product of each individual organic HAP emissions factor calculated in paragraph (a)(1) of section 63.5810 and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in Equation 2 of section 63.5810.



$$\text{Average organic HAP emissions factor} = \frac{\sum_{i=1}^n (\text{Actual Process Stream EF}(i) * \text{Material}(i))}{\sum_{i=1}^n \text{Material}(i)}$$

Where:

Actual Process Stream EF (i) = actual organic HAP emissions factor for process stream (i), lbs/ton;

Material (i) = neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream (i), tons;

n=number of process streams where you calculated an organic HAP emissions factor.

- b. You may, but are not required to, include process streams where you have demonstrated compliance as described in paragraph (a) of section 63.5810, subject to the limitations described in paragraph (a)(2) of section 63.5810, and you are not required to and should not include process streams for which you will demonstrate compliance using the procedures in paragraph (d) of section 63.5810.
- c. Compare each organic HAP emissions factor calculated in paragraph (b)(1) of section 63.5810 with its corresponding organic HAP emissions limit in Table 3 or 5 to this subpart. If all emissions factors are equal to or less than their corresponding emission limits, then you are in compliance.

Should the permittee choose to demonstrate compliance with the emission limitations listed in b)(2)a by one of the alternative compliance demonstrations specified in d)(1), the permittee shall collect and record the information specified in 40 CFR 63.5810(a),(c), or (d), as appropriate.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.5810]

- (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 and operation where resin is used resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission as defined in § 63.5810(a). However, you must retain the records of resin and gel coat organic HAP content, and you must include the list of these resins and gel coats and identify their application methods in your semiannual compliance reports.
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



63.5920(a) – (d)	record keeping format and retention requirements
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[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW]

- (4) The permittee shall utilize one or more compliance options, as specified in OAC rule 3745-21-25(G) to demonstrate compliance with the emission standards for open molding in Table 2 of this rule, as described in the following sections:

OAC rule 3745-21-25(G)(1)	individual resin or gel coat, as applied, emissions limit
OAC rule 3745-21-25(G)(2)	on average, the individual VOC emissions limits for each unique combination of operation type and resin application method or gel coat type
OAC rule 3745-21-25(G)(3)	weighted average VOC emission limit
OAC rule 3745-21-25(G)(4)	VOC emissions limit for one application method and use the same resin(s) for all application methods of that resin type

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25(G)]

- (5) The permittee is currently demonstrating compliance through the option specified in OAC rule 3745-21-25(G)(2). The permittee shall comply with the following data collection, emission calculation, and record keeping requirements, in addition to those listed in d)(6) below:

- a. Group the process streams described in paragraph (G)(1) of this rule by operation type and resin application method or gel coat type listed in table 2 of this rule and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last twelve months. To do this, sum the product of each individual VOC emissions factor calculated in paragraph (G)(1)(a) of this rule and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in the following equation:

$$Average\ VOC\ emissions\ factor = \frac{\sum_{i=1}^n (Actual\ Process\ Stream\ EF(i) * Material(i))}{\sum_{i=1}^n Material(i)}$$

where:

Actual Process Stream EF (i) = actual VOC emissions factor for process stream (i), pounds of VOC per ton of neat resin plus or neat gel coat plus.

Material (i) = the amount of neat resin plus or neat gel coat plus used during the last twelve calendar months for process stream (i), tons.



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n = number of process streams where the owner or operator calculated a VOC emissions factor.

- b. The owner or operator may, but is not required to, include process streams where the owner or operator has demonstrated compliance as described in paragraph (G)(1) of this rule, subject to the limitations described in paragraph (G)(1)(b) of this rule, and the owner or operator is not required to and should not include process streams for which the owner or operator will demonstrate compliance using the procedures in paragraph (G)(4) of this rule.
- c. Compare each VOC emissions factor calculated in paragraph (G)(2)(a) of this rule with its corresponding VOC emissions limit in table 2 or table 3 of this rule. If all emissions factors are equal to or less than their corresponding emission limits, then the operation is in compliance.

Should the permittee choose to demonstrate compliance with the emission limitations listed in b)(2)b by one of the alternative compliance demonstrations specified in d)(4), the permittee shall collect and record the information specified in OAC rule 3745-21-25(G)(1), (3), or (4), as appropriate.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

- (6) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25, including the following sections:

OAC rule 3745-21-25(O)(b)	records of resin and gel coat use, monomer content and operation where resin is used
OAC rule 3745-21-25(O)(c)	resins and gel coats use are not required, when demonstrating compliance with (G)(1) limits, as applied, but include a list of resins and gel coats and identify their application methods in the semiannual compliance reports
OAC rule 3745-21-25(P)(1)(a)	a copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status
OAC rule 3745-21-25(P)(1)(c)	for operations listed in Tables 2, 3, and 4 of OAC rule 3745-21-25 all data, assumptions, and calculations used to determine monomer contents and VOC emissions factors
OAC rule 3745-21-25(P)(4)	record keeping retention requirements

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]



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- (7) The permittee shall maintain the following monthly records for each emissions unit:
 - a. the identification of each resin/gelcoat applied;
 - b. weight of each resin/gelcoat applied (a ton of resin/gelcoat is before the additions of additives such as powders, fillers, glass...etc., but includes additional monomer added to resin);
 - c. the percent of VOC monomer(s), by weight, (e.g., styrene and methyl methacrylate) of each resin/gelcoat applied; and
 - d. the total VOC emission rate for all resins/gelcoats applied, as calculated by the following equation, in pounds per month:

$$\text{VOC (lbs/month)} = \text{EF} \sum_i^n [\text{W}]_i$$

where:

W = weight of each resin or gelcoat, i, applied (a ton of resin or gelcoat is before the additions of additives such as powders, fillers, glass...etc, but include monomer additions), as recorded in d)(7)b;

i = a specific resin or gelcoat applied during the month;

n = total number of resins and gelcoats applied during the month; and

EF = emissions factor(s):

EF = applicable emissions factor(s) from Table 1 of Subpart WWWW of 40 CFR 63.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTIs: P0114467, P0114410 and P0114561]

e) Reporting Requirements

- (1) The permittee shall submit semi-annual reports and such other notifications and reports to the Director (the Ohio EPA eBusiness Center, Air Services) as are required in 40 CFR Part 63, Subpart WWWW, pursuant to the following sections:

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
63.5895(d)	list individual resins and gelcoats and application methods in semi-annual compliance reports

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

- (2) The permittee shall submit semi-annual reports and such other notifications and reports to the Director (the Ohio EPA eBusiness Center, Air Services) as are required in OAC rule 3745-21-25, pursuant to the following sections:

OAC rule 3745-21-25(Q)(1) – (Q)(2)	semi-annual compliance reports
OAC rule 3745-21-25 (Q)(3)(a) – (Q)(3)(h)	content of semi-annual compliance reports
OAC rule 3745-21-25(O)(2)(c)	list individual resins and gelcoats and application methods in semi-annual compliance reports

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

- (3) The permittee shall submit quarterly deviation (excursion) reports which include the following information:
- a. an identification of each month when the VOC emissions exceeded 1,216 pounds per month, and the actual VOC emissions for each such month.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTIs: P0114467, P0114410 and P0114561]

- (4) The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTIs: P0114467, P0114410 and P0114561]

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:

(40 CFR 63.5805, Subpart WWWW, Table 3)
Organic HAP emission limitations in b)(2)a.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1), d)(2) and d)(3) of these terms and conditions.

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

b. Emission Limitation:

(OAC rule 3745-21-25(D)(2), Table 2)
VOC emission limitations in b)(2)b.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(4), d)(5) and d)(6) of these terms and conditions.

[Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-21-25]

c. Emission Limitation:

VOC emissions shall not exceed 1,216 lbs/month and 7.3 ton/year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(7) of these terms and conditions.

The annual emission limitation was developed by multiplying the monthly VOC emission limitation (1,216 lbs/month) by 12 months per year, and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the monthly allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTIs: P0114467, P0114410 and P0114561]

g) Miscellaneous Requirements

(1) None.