



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

7/16/2013

Certified Mail

Jerry Lillie
Hadlock Plastics LLC
110 North Eagle St.
Geneva, OH 44041-1196

Facility ID: 0204030272
Permit Number: P0110110
County: Ashtabula

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

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 Star Beacon. 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, Manager
Permit Issuance and Data Management Section, DAPC

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

PUBLIC NOTICE
7/16/2013 Issuance of Draft Air Pollution Title V Permit

Hadlock Plastics LLC
110 North Eagle St.,
Geneva, OH 44041-1196

Ashtabula County

FACILITY DESC.: All Other Plastics Product Manufacturing

PERMIT #: P0110110

PERMIT TYPE: Renewal

PERMIT DESC: Title V renewal permit for a manufacturer of fiberglass reinforced plastic products. Operations include open molding, compression molding, resin transfer molding and surface coating. This renewal permit includes revision/modification applications: off permit changes for adding newly installed emissions units, combining two facilities under one Title V permit, and for restricting VOC facility-wide emissions to less than 100 tons/yr.

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
 Hadlock Plastics LLC
Permit Number: P0110110
Facility ID: 0204030272

Statement of Basis For Air Pollution Title V Permit

Facility ID:	0204030272
Facility Name:	Hadlock Plastics LLC
Facility Description:	FRP Manufacturing and Coating
Facility Address:	110 North Eagle St., Geneva, OH 44041-1196
Permit #:	P0110110, Title V Renewal, Minor Permit Modification
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)?	Y
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.	N
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)	Minor permit modification is intended to integrate Emission Factors (EFs) for Epoxy and SMC Molding on the existing CMMs.
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



<p>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)</p>	<p>N/A</p>
<p>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)</p>	<p>PTI P0112733 – Issued 4/16/13 for emission units P017 – an administrative modification for the use of new materials - new emissions factors, but no increases in allowable VOC emissions PTI P0113422 – Issued 4/16/13 for emission units P006, P007, P009 and P011 – draft Chapter 31 modification permit for increasing allowable VOC emissions for four mold presses, and for establishing a facility-wide VOC limit of less than 100 tons/yr PTI P0113423 – Issued 4/16/13 for emission units P013 – an administrative modification for reducing allowable VOC emissions PTI P0113424 – Issued 4/16/13 for emission units P004 – an administrative modification for reducing allowable VOC emissions PTI P0113425 – Issued 4/16/13 for emission units P005 – an administrative modification for reducing allowable VOC emissions PTI P0113426 – Issued 4/16/13 for emission units P014 – an administrative modification for reducing allowable VOC emissions PTI P0113427 – Issued 4/16/13 for emission units P008, P010 and P012 – an administrative modification for reducing allowable VOC emissions PTI P0113428 – Issued 4/16/13 for emission units P015 and P016 – an administrative modification for reducing allowable VOC emissions PTI P0113967 – Issued 4/24/13 for emission unit P101 – an administrative permit modification for the removal of cleanup from emissions unit P101 because all cleanup was consolidated under emissions unit P004 - facility-wide cleanup, and for addressing changes with regards to amended OAC rule 3745-21-07(G)(2) PTI P0113968 – Issued 4/24/13 for emission unit R101 – an administrative permit modification for the removal of cleanup from emissions unit R101 because all cleanup was consolidated under emissions unit P004 - facility-wide cleanup, and for addressing changes with regards to amended OAC rule 3745-21-07(G)(2) PTI P0114043 – Issued 4/24/13 for emission unit P002 – an administrative permit modification for addressing changes with regards to amended OAC rule 3745-21-07(G)(2) PTI P0114070 – Issued 4/24/13 for emission unit R011 – an administrative permit modification for addressing changes with regards to amended OAC rule 3745-21-07(G)(2)</p>
<p>Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR</p>	<p>N/A</p>



64. Provide more emissions unit specific detail in Section C.	
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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	77-07(A)(13)	N	Lists insignificant emission units that have one or more applicable requirements.
B.3	31-05(D)		Facility-wide emissions limitation for VOC
B.4	31-05(D)		Monitoring and/or Recordkeeping Requirements for facility-wide VOC emissions limitation
B.5	31-05(D)		Operational restrictions for facility-wide VOC emissions limitation
B.6	31-05(D)		Monitoring and/or Recordkeeping Requirements for facility-wide operational restrictions for limiting facility-wide VOC emissions
B.7	31-05(D)		Reporting Requirements for facility-wide VOC emissions limitation and operational restrictions
B.8		Y	Other – 40 CFR Part 63 Subpart WWWW States applicability of 40 CFR, Part 63, Subpart WWWW for the facility
B.9		Y	Other – 40 CFR Part 63 Subpart WWWW Table 4 work practice standards: keep all containers that store HAP-containing materials closed or covered comply with the mixers' requirements
B.10	77-07(C)(1)		Monitoring and/or Recordkeeping Requirements for facility-wide work practice standard
B.11		Y	Other – 40 CFR Part 63 Subpart WWWW Table 4 Reporting Requirements for work practice standards



B.12		Y	Other – 40 CFR Part 63 Subpart WWWW Additional applicable monitoring and record keeping requirements
B.13		Y	Other – OAC rule 3745-21-25 States applicability of OAC rule 3745-21-25 for the facility
B.14		Y	Other – OAC rule 3745-21-25 Table 1 work practice standards: keep all containers that store HAP-containing materials closed or covered comply with the mixers' requirements
B.15	77-07(C)(1)		Monitoring and/or Recordkeeping Requirements for facility-wide work practice standard
B.16	21-25		Other – OAC rule 3745-21-25 Reporting Requirements for work practice standards
B.17	21-25		Other – OAC rule 3745-21-25 Additional applicable monitoring and record keeping requirements
B.18	21-25		Other – 40 CFR Part 63 Subpart PPPP States applicability of 40 CFR, Part 63, Subpart WWWW for the facility
B.19		Y	Other – ORC 3704.03(F)(4)(b) State modeling requirement



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										
P004	1,650 lbs/month and 9.9 tons/yr	31-05(A)(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.
P004	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	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.



Statement of Basis
 Hadlock Plastics LLC
 Permit Number: P0110110
 Facility ID: 0204030272

	any equipment that directly contacts resin.												
P004	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.		40 CFR Part 63 Subpart WWWW, Table 4	N	N	Y	N	Y	Y	N	N	N	ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required.



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P004			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.
P005, P012, P013, P017	1,650 lbs/month and 9.9 tons/yr	31-05 (A)(3)		N	Y	Y	N	Y	Y	N	N	N	ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required.
P011, P014, P015, P016	1,166 lbs/month and 7.0 tons/yr	31-05 (A)(3)		N	Y	Y	N	Y	Y	N	N	N	ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required.
P006, P007, P008, P009, P010	833 lbs/month and 5.0 tons/yr	31-05 (A)(3)		N	Y	Y	N	Y	Y	N	N	N	ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required.
P005 – P017		21-25 (D)(1) and Table 1	40 CFR Part 63 Subpart WWWW, Table 4	N	Y	Y	N	Y	Y	N	N	N	40 CFR Part 63 Subpart WWWW Table 4 work practice standards: OR – work practice standards: uncover, unwrap or expose only one charge per mold cycle per injection molding machine. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers shall be closed when not adding materials. Other – OAC rule 3745-21-25 Table 1 work practice standards: equivalent to 40 CFR Part 63 Subpart WWWW Table 4
P005 – P017			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.



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 Hadlock Plastics LLC
Permit Number: P0110110
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													ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required.
R101	7.3 tons/yr	31-05 (A)(3)		N	Y	Y	N	Y	Y	N	N	N	ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required.
R001, R002, R008, R009, R101	Table 3 emissions standards		40 CFR Part 63 Subpart WWWW	N	Y	Y	N	Y	Y	N	N	N	ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required.
R001, R002, R008, R009, R101	Table 2	21-25(D)(2)		N	Y	Y	N	Y	Y	N	N	N	ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required.
R001, R002, R008, R009, R101			40 CFR Part 63.1-15	N	Y	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.
R001, R002, R008, R009, R101	Equivalent to 21-25.	31-05(A)(3)		N	Y	Y	N	Y	Y	N	N	N	ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required.
R011	HAP emitted /lb of coating solids used during each 12-month period for general use coating operation		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.



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R003 - R007, R010, R011	0.16 lb organic HAP emitted /lb of coating solids used during each 12-month period for general use coating operation		40 CFR Part 63, Subpart PPPP	N	N	Y	N	Y	Y	N	N	N	ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required.
P002, P101	1,216 lbs/month and 7.3 tons/yr	31-05 (A)(3)		N	Y	Y	N	Y	Y	N	N	N	ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required.
P002, P101			40 CFR Part 63.1- 15	N	N	Y	N	Y	Y	N	N	N	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
Hadlock Plastics LLC**

Facility ID:	0204030272
Permit Number:	P0110110
Permit Type:	Renewal
Issued:	7/16/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Hadlock Plastics LLC

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Draft Title V Permit
Hadlock Plastics LLC
Permit Number: P0110110
Facility ID: 0204030272

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0204030272
Facility Description: FRP Manufacturing and Coating
Application Number(s): A0043288, A0044552, A0044609, A0046697, A0046713, A0047120
Permit Number: P0110110
Permit Description: Title V renewal permit for a manufacturer of fiberglass reinforced plastic products. Operations include open molding, compression molding, resin transfer molding and surface coating. This renewal permit includes revision/modification applications: off permit changes for adding newly installed emissions units, combining two facilities under one Title V permit, and for restricting VOC facility-wide emissions to less than 100 tons/yr.
Permit Type: Renewal
Issue Date: 7/16/2013
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0084224

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

Hadlock Plastics LLC
110 North Eagle St.
Geneva, OH 44041-1196

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
Hadlock Plastics LLC
Permit Number: P0110110
Facility ID: 0204030272
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
Hadlock Plastics LLC
Permit Number: P0110110
Facility ID: 0204030272
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



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

a) B.19.

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

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed below that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, 3745-21 and/or 40 CFR Part 60 or 63.

Emissions units: P001, L001, P018, P019 and P020

[Authority for term: OAC rule 3745-77-07(A)(13)]

3. OAC rule 3745-31-05(D)(1)(a) - Federally enforceable facility-wide VOC emission limitation:

a) The total emissions of volatile organic compounds (VOC) emitted from all emissions units at this facility shall not exceed 99 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

All emissions units that emit VOC emissions are listed below:

Non-insignificant emissions units: P002, P004 – P017, P101, R001 – R011 and R101.

Insignificant emissions units: B001 (Air Makeup Heating), L001 (Parts cleaner), P001 (Paint touch up, aerosol spray paint can), P018 (15 HP Mixer), P019 (7 HP Mixer) and P020 (Dough Mixer)

In lieu of calculating actual monthly VOC emissions from all insignificant emissions units, a value (0.1 ton VOC/month) shall be added each month to the rolling, 12-month summation of monthly emissions. This value was determined by summing the potential VOC emissions from each of the above insignificant emissions units and adding a conservative margin of safety (over 3X the combined PTEs of all insignificant emissions units). This margin of safety will allow for future installations of new VOC insignificant emissions units exempted from permitting (de minimis or PTI exemptions).

[Authority for term: OAC rule 3745-31-05(D)(1)(a), OAC rule 3745-77-07(A)(1) and PTI: P0113422]

4. Facility-wide VOC emissions limitation – Monitoring and/or Recordkeeping Requirements:

a) The permittee shall maintain monthly records of the following information:

(1) The rolling, 12-month summation of tons of VOC emissions, calculated by adding the current month's VOC emissions from all emissions units at this facility to the VOC



emissions for the preceding eleven calendar months from all emissions units at this facility.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI: P0113422]

5. Federally enforceable facility-wide operational restrictions for limiting facility-wide VOC emissions to not to exceed 99 tons per year, based upon a rolling, 12-month summation of the monthly emissions. The permittee shall not exceed any of the operational restrictions in Table 1 below.

The following emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate rolling, 12-month summations of gelcoat, resin and cleanup usages, upon issuance of this permit.

Table 1, Facility-wide operational restrictions			
	Emissions units	Types of operations	Operational restrictions
a.	P005 – P017	Closed molding machines	<p>VOC monomer usage restriction: 1,396 tons of VOC monomer or an amount calculated below, used in all closed molding machines combined, emissions units P005 – P017, based on a rolling, 12-month summation of monthly usage rates.</p> <p>Calculated amount:</p> <p>VOC monomer usage restriction (tons) = Maximum usage of VOC monomer (1,396) – ((1/16.48)(Epoxy SMC usage, in tons, based on a rolling, 12-month summation of monthly usage rates))</p> <p>At the end of each month, whenever epoxy SMC material was used, or was used in the preceding 11-months, in emissions units P005 – P017, the permittee must calculate a VOC monomer usage restriction and must be in compliance with it.</p> <p>For every 16.48 tons of Epoxy SMC material used in closed molding machines, P005 – P017, 1 ton of VOC monomer will be subtracted from, and will reset, the operational restriction above.</p>



Effective Date: To be entered upon final issuance

b.	P005 – P017	Closed molding machines	<p>Epoxy SMC material usage restriction: 23,011 tons of Epoxy SMC material or an amount calculated below, used in all closed molding machines combined, emissions units P005 – P017, based on a rolling, 12-month summation of monthly usage rates.</p> <p>Calculated amount:</p> <p>Epoxy SMC material usage restriction (tons) = Maximum usage of Epoxy SMC material (23,011) – (16.48)(VOC monomer usage, in tons, based on a rolling, 12-month summation of monthly usage rates)</p> <p>At the end of each month, whenever VOC monomer was used, or was used in the preceding 11-months, in emissions units P005 – P017, the permittee must calculate an Epoxy SMC material usage restriction and must be in compliance with it.</p> <p>For every (1) ton of VOC monomer used in closed molding machines, P005 – P017, 16.48 tons of Epoxy SMC material will be subtracted from, and will reset, the operational restriction above.</p>
c.	P005 – P017	Closed molding machines	<p>Maximum usage: 7,050 tons of Phenolic SMC material, used in all closed molding machines combined, emissions units P005 – P017, based on a rolling, 12-month summation of monthly usage rates</p>
d.	P002 and P101	Resin transfer molding	<p>Maximum usage: 36.5 tons of VOC monomer, used in all resin transfer molding combined, emissions units P002 and P101, based on a rolling, 12-month summation of monthly usage rates</p>
e.	R101, R001, R002, R008, R009	Open molding – gelcoat application	<p>Maximum usage: 46.5 tons of gelcoat, used in all open molding areas combined, emissions units R101, R001, R008 and R009, based on a rolling, 12-month summation of monthly usage rates</p> <p>Note: For this restriction, a ton of gelcoat is before the additions of additives such as powders, fillers, glass...etc.</p>
f.	R101, R001, R002, R008, R009	Open molding – manual application	<p>Maximum usage: 83 tons of resin, used in all open molding areas combined, emissions units R101, R001, R008 and R009, based on a rolling, 12-month summation of monthly usage rates</p> <p>Note: For this restriction, a ton of resin is before the additions of additives such as powders, fillers, glass...etc.</p>



g. A u t h o r i t	R101, R001, R002, R008, R009	Open molding – sprayup, non-atomized application	Maximum usage: 83 tons of resin, used in all open molding areas combined R101, R001, R002, R008 and R009 using sprayup, non-atomized application, based on a rolling, 12-month summation of monthly usage rates Note: For this restriction, a ton of resin is before the additions of additives such as powders, fillers, glass...etc.
h. f o r	R003 – R007, R010, R011	Surface coating	Maximum usage: 7,200 gallons of coating from all surface coating operations combined, emissions units R003 – R007, R010 and R011, based on a rolling, 12- month summation of monthly usage rates
i. t e r	R003 – R007, R010, R011	Surface coating	Maximum allowable average weighted VOC content limit: 6.2 lbs VOC/gal of coating, based on a rolling, 12- month average of coatings
m : O A C	R003 – R007, R010, R011	Surface coating – cleanup	Maximum usage: 3,780 gallons of cleanup from all surface coating operations combined, emissions units R003 – R007, R010 and R011, based on a rolling, 12- month summation of monthly usage rates
k. C	R003 – R007, R010, R011	Surface coating – cleanup	Maximum allowable VOC content for each cleanup: 0.42, in lb VOC/gal of cleanup
l. u l l e	P004	Facility – wide cleanup	Maximum usage: 7,650 gallons of cleanup for all facility-wide cleanup, based on a rolling, 12-month summation of monthly usage rates
m. 3 7	P004	Facility – wide cleanup	Maximum allowable VOC content for each cleanup: 0.42, in lb VOC/gal of cleanup

45-31-05(D)(1)(a), OAC rule 3745-77-07(A)(1) and PTI: P0113422]

6. Facility-wide operational restrictions for limiting facility-wide VOC emissions – Monitoring and/or Recordkeeping Requirements:
 - a) The permittee shall maintain monthly records of the following information:
 - (1) For compression molding machines, emissions units P005 – P017:
 - (a) A rolling, 12-month summation of the total amount of tons of VOC monomer (available VOC and organic HAPs as contained in mold compound) used in emissions units P005 – P017 combined, calculated by adding the current month’s combined usage amount of VOC monomer from emissions units P005 – P017 to the preceding eleven calendar months of combined usage amount of VOC monomer from emissions units P005 – P017.



- (b) Calculate a VOC monomer usage restriction, by multiplying the total amount of Epoxy SMC material used, as calculated in B.5.a)(2)(a) below, by (1/16.48) and then subtract this product from 1,396 tons of VOC monomer. This calculation shall be performed only if Epoxy SMC material has been used in emissions units P005 – P017 within the past 12-months.

- (2) For compression molding machines, emissions units P005 – P017:
 - (a) A rolling, 12-month summation of the total amount of tons of Epoxy SMC material used in emissions units P005 – P017 combined, calculated by adding the current month's combined usage amount of Epoxy SMC material from emissions units P005 – P017 to the preceding eleven calendar months of combined usage amount of Epoxy SMC material from emissions units P005 – P017.
 - (b) Calculate an Epoxy SMC material usage restriction, by multiplying the total amount of VOC monomer used, as calculated in B.5.a)(1)(a) above, by (16.48) and then subtract this product from 23,011 tons of Epoxy SMC material. This calculation shall be performed only if VOC monomer has been used in emissions units P005 – P017 within the past 12-months.

- (3) For compression molding machines, emissions units P005 – P017:
 - (a) A rolling, 12-month summation of the total amount of tons of Phenolic SMC material used in emissions units P005 – P017 combined, calculated by adding the current month's combined usage amount of Phenolic SMC material from emissions units P005 – P017 to the preceding eleven calendar months of combined usage amount of Phenolic SMC material from emissions units P005 – P017.

- (4) For resin transfer molding, emissions units P002 and P101:
 - (a) A rolling, 12-month summation of the total amount of tons of VOC monomer (available VOC and organic HAPs as contained in mold compound) used in emissions units P002 and P101 combined, calculated by adding the current month's combined usage amount of VOC monomer from emissions units P002 and P101 to the preceding eleven calendar months of combined usage amount of VOC monomer from emissions units P002 and P101.

- (5) For open molding operations – gelcoat application, emissions units R101, R001, R002, R008 and R009:
 - (a) A rolling, 12-month summation of the total amount of tons of gelcoat used in emissions units R101, R001, R002, R008 and R009 combined, calculated by adding the current month's combined gelcoat usage amount from emissions units R101, R001, R002, R008 and R009 to the preceding eleven calendar months of combined gelcoat usage amount from emissions units R101, R001, R002, R008 and R009; and



- (b) The weight percent of VOC monomer (available VOC and organic HAP) in each gelcoat, as applied (styrene, methyl methacrylate, etc., plus any extra added by the molder).

- (6) For open molding operations – resin manual application, emissions units R101, R001, R002, R008 and R009:
 - (a) A rolling, 12-month summation of the total amount of tons of resin used in emissions units R101, R001, R002, R008 and R009 combined, calculated by adding the current month’s combined resin usage amount from emissions units R101, R001, R002, R008 and R009 to the preceding eleven calendar months of combined resin usage amount from emissions units R101, R001, R002, R008 and R009; and
 - (b) The weight percent of VOC monomer (available VOC and organic HAP) in each resin, as applied, (styrene, methyl methacrylate, etc., plus any extra added by the molder).

- (7) For open molding operations – resin sprayup, non-atomized application, emissions units R101, R001, R002, R008 and R009:
 - (a) A rolling, 12-month summation of the total amount of tons of resin used in emissions units R101, R001, R002, R008 and R009 combined, calculated by adding the current month’s combined resin usage amount from emissions units R101, R001, R002, R008 and R009 to the preceding eleven calendar months of combined resin usage amount from emissions units R101, R001, R002, R008 and R009; and
 - (b) The weight percent of VOC monomer (available VOC and organic HAP) in each resin, as applied, (styrene, methyl methacrylate, etc., plus any extra added by the molder).

- (8) For surface coating operations, emissions units R003 – R007, R010 and R011:
 - (a) A rolling, 12-month summation of the total gallons of coatings used in emissions units R003 – R007, R010 and R011 combined, calculated by adding the current month’s combined coating usage from emissions units R003 – R007, R010 and R011 to the preceding eleven calendar months of combined coating usage from emissions units R003 – R007, R010 and R011; and
 - (b) Average weighted VOC content, in lbs VOC/gal, calculated by using the following equation:

$$C_{VOC,A} = \frac{\sum_{i=1}^n C_{VOC,i} L_{Ci}}{\sum_{i=1}^n L_{Ci}}$$



where:

$C_{VOC,A}$ = the average weighted VOC content of all coatings, applied during each rolling, 12-month average from emission units R003 – R007, R010 and R011;

$C_{VOC,i}$ = VOC content of coating (i);

L_{Ci} = liquid volume of coating (i);

(i) = each coating applied during each rolling, 12-month period; and

(n) = total number of coatings that were applied during each rolling, 12-month period.

- (9) For surface coating operations, emissions units R003 – R007, R010 and R011:
 - (a) A rolling, 12-month summation of the total gallons of cleanup used in emissions units R003 – R007, R010 and R011 combined, calculated by adding the current month's combined cleanup usage from emissions units R003 – R007, R010 and R011 to the preceding eleven calendar months of combined cleanup usage from emissions units R003 – R007, R010 and R011; and
 - (b) The VOC content, in lbs VOC/gal, of each cleanup material.
- (10) For facility-wide cleanup, emissions unit P004:
 - (a) A rolling, 12-month summation of the total gallons of cleanup used in emissions unit P004, calculated by adding the current month's cleanup usage from emissions unit P004 to the preceding eleven calendar months of cleanup usage from emissions unit P004; and
 - (b) The VOC content, in lbs VOC/gal, of each cleanup material.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI: P0113422]

- 7. Facility-wide VOC emissions limitation and operational restrictions for limiting facility-wide VOC emissions – Reporting Requirements:
 - a) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - (1) all exceedances of the rolling, 12-month emission limitation for VOC, in B.3;
 - (2) all exceedances of all rolling, 12-month operational restrictions for VOC monomer usages, in B.5, Table 1, facility-wide operational restrictions a and d;
 - (3) all exceedances of all rolling, 12-month operational restrictions for SMC material usages, in B.5, Table 1, facility-wide operational restrictions b and c;
 - (4) all exceedances of all rolling, 12-month operational restrictions for gelcoat and resin usages, in B.5, Table 1, facility-wide operational restrictions e, f and g;



- (5) all exceedances of the rolling, 12-month operational restrictions for surface coating usage, in B.5, Table 1, facility-wide operational restriction h;
- (6) all exceedances of the average weighted VOC content for all surface coatings, in B.5, Table 1, facility-wide operational restriction i;
- (7) all exceedances of all rolling, 12-month operational restrictions for cleanup usages, in B.5, Table 1, facility-wide operational restrictions j and l; and
- (8) all exceedances of all allowable VOC content limits for cleanup, in B.5, Table 1, facility-wide operational restrictions k and m.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI: P0113422]

- 8. The following emissions units as well as containers storing HAP-containing materials are subject to 40 CFR Part 63, Subpart WWWW: P002, P004 – P020, P101, R001, R002, R008, R009 and R101. 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 or local air agency.

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

- 9. 40 CFR, Part 63, Subpart WWWW – Operational Restrictions for the facility-wide work practice standards:
 - 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.
 - b) For mixing operations, the permittee shall meet the following work practice standards:
 - (1) use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;
 - (2) close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and
 - (3) keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

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

- 10. 40 CFR, Part 63, Subpart WWWW – Monitoring and/or Recordkeeping Requirements for facility-wide work practice standards:
 - a) The permittee shall perform daily inspections when in operation of all containers that store HAP-containing materials, and record the following information:



- (1) the date and reason why any required inspection was not performed;
- (2) the date and all times when containers that store HAP-containing materials were not closed or covered, except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety; and
- (3) information on the duration and cause of each deviation and the corrective action taken.

b) The permittee shall perform daily inspections of each mixer when resin is present in the mixing vessel, and record the following information:

- (1) the date and reason why any required inspection was not performed;
- (2) the date and all times the mixer cover was not closed over the mixing vessel, when actual mixing is occurring, except when adding materials or changing covers to the mixing vessel;
- (3) the date and all times the mixer vents were not closed over the mixing vessel, when actual mixing is occurring, except that venting is allowed during additions of materials, or as necessary prior to adding materials or opening the cover for safety;
- (4) the date and all times when visible gaps were present in the mixer cover, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation when the mixer cover was properly employed; and
- (5) information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW and PTI: P0113422]

11. 40 CFR, Part 63, Subpart WWWW – Reporting Requirements for facility-wide work practice standards:

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

- (1) if there are no deviations from this work practice standard in B.9.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);
- (2) if there were deviations with this work practice standard in B.9.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;
- (3) if there are no deviations from the work practice standards in B.9.b)(1) – B.9.b)(3), provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., (1) used mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch were permissible around mixer shafts and any required instrumentation; (2) closed any mixer vents when actual mixing was occurring, except that venting was allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and (3) kept the



mixer covers closed while actual mixing was occurring except when adding materials or changing covers to the mixing vessels.); and

- (4) if there were deviations with the work practice standards in B.9.b)(1) – B.9.b)(3), 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 PTI: P0113422]

- 12. 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]

- 13. The following emissions units as well as containers storing HAP-containing materials are subject to OAC rule 3745-21-25: P004 – P020, R001, R002, R008, R009 and R101.

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

- 14. OAC rule 3745-21-25 – Operational Restrictions for the facility-wide work practice standards:

- 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.
- b) For mixing operations, the permittee shall meet the following work practice standards:
 - (1) use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;
 - (2) close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and



- (3) keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

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

15. OAC rule 3745-21-25 – Monitoring and/or Record keeping Requirements for facility-wide work practice standards:

- a) The permittee shall perform daily inspections when in operation of all containers that store VOC-containing materials, and record the following information:

- (1) the date and reason why any required inspection was not performed;
- (2) the date and all times when containers that store VOC-containing materials were not closed or covered, except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety; and
- (3) information on the duration and cause of each deviation and the corrective action taken.

- b) The permittee shall perform daily inspections of each mixer when resin is present in the mixing vessel, and record the following information:

- (1) the date and reason why any required inspection was not performed;
- (2) the date and all times the mixer cover was not closed over the mixing vessel, when actual mixing is occurring, except when adding materials or changing covers to the mixing vessel;
- (3) the date and all times the mixer vents were not closed over the mixing vessel, when actual mixing is occurring, except that venting is allowed during additions of materials, or as necessary prior to adding materials or opening the cover for safety;
- (4) the date and all times when visible gaps were present in the mixer cover, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation when the mixer cover was properly employed; and
- (5) information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25 and PTI: P0113422]

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

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

- (1) if there are no deviations from the work practice standard in B.14.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);



Effective Date: To be entered upon final issuance

- (2) if there were deviations with the work practice standard in B.14.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;
- (3) if there are no deviations from the work practice standards in B.14.b)(1) – B.14.b)(3), provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., (1) used mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch were permissible around mixer shafts and any required instrumentation; (2) closed any mixer vents when actual mixing was occurring, except that venting was allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and (3) kept the mixer covers closed while actual mixing was occurring except when adding materials or changing covers to the mixing vessels.); and
- (4) if there were deviations with the work practice standards in B.14.b)(1) – B.14.b)(3), 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) and OAC rule 3745-21-25]

17. 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]



18. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart PPPP: R003 – R007, R010 and R011. 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 or local air agency.

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

19. State modeling requirement: Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

[Authority for term: PTI: P0113422]



Draft Title V Permit
Hadlock Plastics LLC
Permit Number: P0110110
Facility ID: 0204030272
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P004, PARTS CLEANING

Operations, Property and/or Equipment Description:

Parts cleaning, mold preparation and cleanup operations

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(D)(1)(a) For the avoidance of Prevention of Significant Deterioration (PSD) and non-attainment New Source Review (NSR)	See B.3: facility-wide limit for volatile organic compounds (VOC) emissions.
b.	OAC rule 3745-31-05(A)(3) (PTI: P0113424)	Total organic compound (OC) emissions emitted from all mold preparation materials (mold strippers and releases) and cleanup materials (cleanup), from all fiberglass reinforced plastic operations, excluding coating operations, shall not exceed 1,650 lbs/month and 9.9 tons/yr.
c.	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).
d.	OAC rule 3745-21-25(D)(1) For cleanup only	a) 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.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b(2)a for operations excluded from this rule. See b(2)b for definition for cleanup from this rule.
e.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935) For cleanup only	Work practice standards in Table 4 of Subpart WWWW: b) 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. See b(2)a for operations excluded from the rule. See b(2)b for definition for cleanup from this rule.
f.	40 CFR Part 63.1 – 63.16 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), 40 CFR Part 63, Subpart WWWW and PTI P0113424]

- (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), OAC rule 3745-21-25 and PTI P0113424]

- (3) The permittee shall maintain the following monthly records for this emissions unit:
- a. the name and identification number of each cleanup, mold release and mold stripper as applied;
 - b. an identification of each cleanup, mold release and mold stripper as applied, and identify as whether it's an OC, VOC and/or HAP;
 - c. OC/VOC density and weight fraction or OC/VOC density and volume fraction for each cleanup, mold release and mold stripper applied;
 - d. weight or volume of each cleanup, mold release and mold stripper applied;
 - e. calculate OC and VOC emission rate(s) for all cleanup, mold releases and mold strippers applied, in lbs/month;
 - f. If a credit for recovered cleanup materials (cleanup) 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 material (cleanup) may be used to adjust to amount of OC and VOC emissions in section d)(3)e.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0113424]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each month when the VOC emissions exceeded 1,650 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 PTI P0113424]

- (2) The permittee must submit semiannual compliance reports:
 - a. 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., 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)e, 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)d and b)(1)e, 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, OAC rule 3745-21-25(D)(1) and PTI P0113424]



- (3) The permittee shall submit annual reports that specify the total VOC emissions and total OC 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 P0113424]

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:

Total OC emissions emitted from all mold preparation materials (mold strippers and releases), cleanup materials (cleanup), from fiberglass reinforced plastic operations, excluding coating operations, shall not exceed 1,650 lbs/month and 9.9 tons/yr.

Applicable Compliance Method:

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

The annual emission limitation was developed by multiplying the monthly OC emission limitation (1,650 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 PTI P0113424]

g) Miscellaneous Requirements

- (1) None.



2. Emissions Unit Group -CMM - Large Tonnage: P005, P012, P013, P017

EU ID	Operations, Property and/or Equipment Description
P005	Closed Molding Press
P012	Closed Molding Press
P013	Closed Molding Press
P017	Closed Molding Press

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(D)(1)(a) For the avoidance of Prevention of Significant Deterioration (PSD) and non-attainment New Source Review (NSR)	See B.3: facility-wide limit for volatile organic compounds (VOC) emissions.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTIs: P0114540, P0114541, P0114542 and P0114543)	VOC emissions shall not exceed the 1,650 lbs/month and 9.9 tons/yr. See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
d.	OAC rule 3745-21-25	Work practice standards in Table 1 of OAC rule 3745-21-25. See c)(1).
e.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Work practice standard in Table 4 of Subpart WWWW. See c)(1).
f.	40 CFR Part 63.1 through 63.16	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.



(2) Additional Terms and Conditions

- a. 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.
- b. 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) The permittee shall uncover, unwrap or expose only one charge per mold cycle per compression molding machine.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-21-25, 40 CFR Part 63, Subpart WWWW and PTIs P0114540, P0114541, P0114542 and P0114543]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following monthly records for each emissions unit:
 - a. the identification of each mold compound (SMC/BMC) employed;
 - b. the weight of each mold compound (SMC/BMC) employed;
 - c. the percent of VOC monomer(s), by weight, of each mold compound (SMC/BMC) employed; and
 - d. the total VOC emission rate for all mold compound used, as calculated by the following equation, in pounds per month:

$$\text{VOC} \left(\frac{\text{lbs}}{\text{month}} \right) = \text{EF} \sum_i^n [(W)(P)]_i + \text{EF} \sum_j^k [(W2)]_j$$

where:

W = the weight of each polyester mold compound employed, as recorded in d)(1)b;



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P = the percent of VOC monomer, by weight, of each mold compound (SMC/BMC) employed, as recorded in d)(1)c;

Note: VOC monomers include all available VOC monomers and available organic HAP monomers in each mold compound (e.g., styrene, vinyl toluene, methyl methacrylate, and etc.). The product [(W)(P)] is the amount of VOC monomers, in tons, of each mold compound (SMC/BMC) employed.

i = a specific polyester mold compound material (SMC/BMC) employed during the month;

n = total number of polyester mold compound materials (SMC/BMC) employed during the month;

W2 = the weight of each phenolic or epoxy mold compound employed, as recorded in d)(1)b;

j = a specific phenolic or epoxy mold compound material (SMC/BMC) employed during the month;

k = total number of phenolic or epoxy mold compound materials (SMC/BMC) employed during the month; and

EF = emissions factors:

- (a) For polyester resins (excluding epoxy and phenolic mold compound):

EF = 30 lbs of VOC emissions emitted / tons of VOC monomer input

[0.015 lb of VOC emissions emitted / lb of VOC monomer input, ANSI/ACMA/ICPA UEF-1-2011a, Estimating Emission Factors from Open Molding and Other Composite Processes

(0.015 lb VOC/lb monomer input) x 2000 lbs/ton = EF (30 lbs VOC /tons VOC monomer input)]

- (b) For epoxy resin:

EF = 1.82 lb of VOC emissions emitted / ton of epoxy mold compound material (SMC/BMC)

1.82 lb of VOC/ ton of epoxy as determined from emissions testing for the production epoxy SMC, conducted from June 22, 1999 to June 23, 1999 at Quantum Composites, Inc.



- (c) For phenolic resin:

EF = 0.28 lb of VOC emissions emitted / tons of phenolic mold compound material (SMC/BMC)

0.28 lb of VOC / tons of phenolic mold compound as determined from emissions testing, conducted from June 22, 1999 to June 23, 1999 at Quantum Composites, Inc..

[Authority for term: OAC rule 3745-77-07(C)(1) and PTIs P0114540, P0114541, P0114542 and P0114543]

- (2) The permittee shall inspect each molding machine when in operation, and record the following information:
- a. the date and reason why any required inspection was not performed;
 - b. the date and all times when two or more charges were uncovered, unwrapped or exposed per mold cycle per compression molding machine; and
 - c. information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTIs P0114540, P0114541, P0114542 and P0114543]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. each month when the VOC emissions exceeded the 1,650 pounds per month limit, 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 P0114540, P0114541, P0114542 and P0114543]

- (2) The permittee must submit semiannual compliance reports:
- a. if there are no deviations from the work practice standard in c)(1), provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., the facility had uncovered, unwrapped or exposed only one charge per mold cycle per compression molding machine); and
 - b. if there were deviations with the work practice standard in c)(1), 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), OAC rule 3745-21-25, 40 CFR Part 63, Subpart WWWW and PTIs P0114540, P0114541, P0114542 and P0114543]

- (3) The permittee shall submit annual reports that 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 P0114540, P0114541, P0114542 and P0114543]

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:

VOC emissions shall not exceed the 1,650 lbs/month and 9.9 tons/yr.

Applicable Compliance Method:

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

The annual emission limitation was developed by multiplying the monthly VOC emission limitation (1,650 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 P0114540, P0114541, P0114542 and P0114543]

g) Miscellaneous Requirements

- (1) None.



3. Emissions Unit Group -CMM - Medium Tonnage: P011, P014, P015, P016

EU ID	Operations, Property and/or Equipment Description
P011	Closed Molding Press
P014	Closed Molding Press
P015	Closed Molding Press
P016	Closed Molding Press

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(D)(1)(a) For the avoidance of Prevention of Significant Deterioration (PSD) and non-attainment New Source Review (NSR)	See B.3: facility-wide limit for volatile organic compounds (VOC) emissions.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTIs: P0113422, P0114535 and P0114539)	VOC emissions shall not exceed the 1,166 lbs/month and 7.0 tons/yr. See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
d.	OAC rule 3745-21-25	Work practice standards in Table 1 of OAC rule 3745-21-25. See c)(1).
e.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Work practice standard in Table 4 of Subpart WWWW. See c)(1).
f.	40 CFR Part 63.1 through 63.16	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.



(2) Additional Terms and Conditions

- a. 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.
- b. 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) The permittee shall uncover, unwrap or expose only one charge per mold cycle per compression molding machine.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-21-25, 40 CFR Part 63, Subpart WWWW and PTIs P0113422, P0114535 and P0114539]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following monthly records for each emissions unit:
 - a. the identification of each mold compound (SMC/BMC) employed;
 - b. the weight of each mold compound (SMC/BMC) employed;
 - c. the percent of VOC monomer(s), by weight, of each mold compound (SMC/BMC) employed; and
 - d. the total VOC emission rate for all mold compound used, as calculated by the following equation, in pounds per month:

$$\text{VOC} \left(\frac{\text{lbs}}{\text{month}} \right) = \text{EF} \sum_i^n [(W)(P)]_i + \text{EF} \sum_j^k [(W2)]_j$$

where:

W = the weight of each polyester mold compound employed, as recorded in d)(1)b;



P = the percent of VOC monomer, by weight, of each mold compound (SMC/BMC) employed, as recorded in d)(1)c;

Note: VOC monomers include all available VOC monomers and available organic HAP monomers in each mold compound (e.g., styrene, vinyl toluene, methyl methacrylate, and etc.). The product [(W)(P)] is the amount of VOC monomers, in tons, of each mold compound (SMC/BMC) employed.

i = a specific polyester mold compound material (SMC/BMC) employed during the month;

n = total number of polyester mold compound materials (SMC/BMC) employed during the month;

W2 = the weight of each phenolic or epoxy mold compound employed, as recorded in d)(1)b;

j = a specific phenolic or epoxy mold compound material (SMC/BMC) employed during the month;

k = total number of phenolic or epoxy mold compound materials (SMC/BMC) employed during the month; and

EF = emissions factors:

(a) For polyester resins (excluding epoxy and phenolic mold compound):

EF = 30 lbs of VOC emissions emitted / tons of VOC monomer input

[0.015 lb of VOC emissions emitted / lb of VOC monomer input, ANSI/ACMA/ICPA UEF-1-2011a, Estimating Emission Factors from Open Molding and Other Composite Processes

(0.015 lb VOC/lb monomer input) x 2000 lbs/ton = EF (30 lbs VOC /tons VOC monomer input)]

(b) For epoxy resin:

EF = 1.82 lb of VOC emissions emitted / ton of epoxy mold compound material (SMC/BMC)

1.82 lb of VOC/ ton of epoxy as determined from emissions testing for the production epoxy SMC, conducted from June 22, 1999 to June 23, 1999 at Quantum Composites, Inc.

(c) For phenolic resin:

EF = 0.28 lb of VOC emissions emitted / tons of phenolic mold compound material (SMC/BMC)



0.28 lb of VOC / tons of phenolic mold compound as determined from emissions testing, conducted from June 22, 1999 to June 23, 1999 at Quantum Composites, Inc.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTIs P0113422, P0114535 and P0114539]

- (2) The permittee shall inspect each molding machine when in operation, and record the following information:
- a. the date and reason why any required inspection was not performed;
 - b. the date and all times when two or more charges were uncovered, unwrapped or exposed per mold cycle per compression molding machine; and
 - c. information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTIs P0113422, P0114535 and P0114539]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. each month when the VOC emissions exceeded the 1,166 pounds per month limit, 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 P0113422, P0114535 and P0114539]

- (2) The permittee must submit semiannual compliance reports:
- a. if there are no deviations from the work practice standard in c)(1), provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., the facility had uncovered, unwrapped or exposed only one charge per mold cycle per compression molding machine); and
 - b. if there were deviations with the work practice standard in c)(1), 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), OAC rule 3745-21-25, 40 CFR Part 63, Subpart WWWW and PTIs P0113422, P0114535 and P0114539]

- (3) The permittee shall submit annual reports that 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 P0113422, P0114535 and P0114539]

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:

VOC emissions shall not exceed the 1,166 lbs/month and 7.0 tons/yr.

Applicable Compliance Method:

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

The annual emission limitation was developed by multiplying the monthly VOC emission limitation (1,166 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 P0113422, P0114535 and P0114539]

g) Miscellaneous Requirements

- (1) None.



4. Emissions Unit Group -CMM - Small Tonnage: P006, P007, P008, P009, P010

EU ID	Operations, Property and/or Equipment Description
P006	Closed Molding Press
P007	Closed Molding Press
P008	Closed Molding Press
P009	Closed Molding Press
P010	Closed Molding Press

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(D)(1)(a) For the avoidance of Prevention of Significant Deterioration (PSD) and non-attainment New Source Review (NSR)	See B.3: facility-wide limit for volatile organic compounds (VOC) emissions.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTIs: P0113422 and P0114541)	VOC emissions shall not exceed the 833 lbs/month and 5.0 tons/yr. See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
d.	OAC rule 3745-21-25	Work practice standards in Table 1 of OAC rule 3745-21-25. See c)(1).
e.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Work practice standard in Table 4 of Subpart WWWW. See c)(1).
f.	40 CFR Part 63.1 through 63.16	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.



(2) Additional Terms and Conditions

- a. 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.
- b. 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) The permittee shall uncover, unwrap or expose only one charge per mold cycle per compression molding machine.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-21-25, 40 CFR Part 63, Subpart WWWW and PTIs P0113422 and P0114541]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following monthly records for each emissions unit:
 - a. the identification of each mold compound (SMC/BMC) employed;
 - b. the weight of each mold compound (SMC/BMC) employed;
 - c. the percent of VOC monomer(s), by weight, of each mold compound (SMC/BMC) employed; and
 - d. the total VOC emission rate for all mold compound used, as calculated by the following equation, in pounds per month:

$$\text{VOC} \left(\frac{\text{lbs}}{\text{month}} \right) = \text{EF} \sum_i^n [(W)(P)]_i + \text{EF} \sum_j^k [(W2)]_j$$

where:

W = the weight of each polyester mold compound employed, as recorded in d)(1)b;



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P = the percent of VOC monomer, by weight, of each mold compound (SMC/BMC) employed, as recorded in d)(1)c;

Note: VOC monomers include all available VOC monomers and available organic HAP monomers in each mold compound (e.g., styrene, vinyl toluene, methyl methacrylate, and etc.). The product [(W)(P)] is the amount of VOC monomers, in tons, of each mold compound (SMC/BMC) employed.

i = a specific polyester mold compound material (SMC/BMC) employed during the month;

n = total number of polyester mold compound materials (SMC/BMC) employed during the month;

W2 = the weight of each phenolic or epoxy mold compound employed, as recorded in d)(1)b;

j = a specific phenolic or epoxy mold compound material (SMC/BMC) employed during the month;

k = total number of phenolic or epoxy mold compound materials (SMC/BMC) employed during the month; and

EF = emissions factors:

(a) For polyester resins (excluding epoxy and phenolic mold compound):

EF = 30 lbs of VOC emissions emitted / tons of VOC monomer input

[0.015 lb of VOC emissions emitted / lb of VOC monomer input, ANSI/ACMA/ICPA UEF-1-2011a, Estimating Emission Factors from Open Molding and Other Composite Processes

(0.015 lb VOC/lb monomer input) x 2000 lbs/ton = EF (30 lbs VOC /tons VOC monomer input)]

(b) For epoxy resin:

EF = 1.82 lb of VOC emissions emitted / ton of epoxy mold compound material (SMC/BMC)

1.82 lb of VOC/ ton of epoxy as determined from emissions testing for the production epoxy SMC, conducted from June 22, 1999 to June 23, 1999 at Quantum Composites, Inc.

(c) For phenolic resin:

EF = 0.28 lb of VOC emissions emitted / tons of phenolic mold compound material (SMC/BMC)



0.28 lb of VOC / tons of phenolic mold compound as determined from emissions testing, conducted from June 22, 1999 to June 23, 1999 at Quantum Composites, Inc.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTIs P0113422 and P0114541]

- (2) The permittee shall inspect each molding machine when in operation, and record the following information:
- a. the date and reason why any required inspection was not performed;
 - b. the date and all times when two or more charges were uncovered, unwrapped or exposed per mold cycle per compression molding machine; and
 - c. information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTIs P0113422 and P0114541]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. each month when the VOC emissions exceeded the 833 pounds per month limit, 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 P0113422 and P0114541]

- (2) The permittee must submit semiannual compliance reports:
- a. if there are no deviations from the work practice standard in c)(1), provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., the facility had uncovered, unwrapped or exposed only one charge per mold cycle per compression molding machine); and
 - b. if there were deviations with the work practice standard in c)(1), 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), OAC rule 3745-21-25, 40 CFR Part 63, Subpart WWWW and PTIs P0113422 and P0114541]



- (3) The permittee shall submit annual reports that 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 P0113422 and P0114541]

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:

VOC emissions shall not exceed the 833 lbs/month and 5.0 tons/yr.

Applicable Compliance Method:

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

The annual emission limitation was developed by multiplying the monthly VOC emission limitation (833 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 P0113422 and P0114541]

g) Miscellaneous Requirements

- (1) None.



5. Emissions Unit Group -OM - Open Molding: R001, R002, R008, R009, R101

EU ID	Operations, Property and/or Equipment Description
R001	Open Molding
R002	Open Molding
R008	Open Molding
R009	Open Molding
R101	Open Molding - Cedar St.

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(D)(1)(a) For the avoidance of Prevention of Significant Deterioration (PSD) and non-attainment New Source Review (NSR)	See B.3: facility-wide limit for volatile organic compounds (VOC) emissions.
b.	OAC rule 3745-31-05(A)(3) (PTI: 02-01988m1 for R001, R002, R008 and R009)	The Best Available Technology (BAT) Determination is compliance with the applicable OAC rule. VOC emissions shall not exceed 7.3 tons/yr.
c.	OAC rule 3745-31-05(A)(3) (PTI: P0113968 for R101)	VOC emissions shall not exceed 7.3 tons/yr.
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Organic hazardous air pollutants (HAP) shall not exceed the emissions standards as specified in 40 CFR 63.5805, Subpart WWWW. See b)(2)a, Table 3 of Subpart WWWW.
e.	40 CFR Part 63.1 – 63.16 (40 CFR 63.5925)	Table 15 to Subpart WWWW – Applicability of General Provisions, Subpart A.



Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-21-25(D)	VOC emissions shall not exceed the emissions standards as specified in OAC rule 3745-21-25(D)(2). See b)(2)b, 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 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. 4 /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. 5 /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.



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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)		Table 2
For VOC threshold less than 100 tons		
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.



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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 P0113968]

- (2) The permittee is currently demonstrating compliance through the option specified in §63.5810(a). 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. Calculate your actual organic HAP emissions factor for each different process stream within this emissions unit. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. You must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 of 40 CFR Part 63, Subpart WWWW for open molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in §63.5796. The emission factor calculation should include any and all emission reduction techniques used. If you are using vapor suppressants to reduce HAP emissions, you must determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in Appendix A to Subpart WWWW of 40 CFR Part 63.

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(b),(c), or (d), as appropriate.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.5810 and PTI P0113968]



- (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

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW and PTI P0113968]

- (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), OAC rule 3745-21-25(G) and PTIs 02-01988 and P0113968]

- (5) The permittee is currently demonstrating compliance through the option specified in OAC rule 3745-21-25(G)(1). The permittee shall comply with the following data collection, emission calculation, and record keeping requirements, in addition to those listed in d)(6) below:



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- a. Calculate the actual VOC emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus monomer content, the gel coat type, the application technique, or the control technique. The owner or operator shall calculate VOC emissions factors for each different process stream by using the appropriate equations in Table 1 to Subpart WWWW of 40 CFR Part 63 for open molding and for centrifugal casting, or site-specific VOC emissions factors discussed in paragraph (E) of OAC rule 3745-21-25. The emission factor calculation should include any and all emission reduction techniques used including any add-on controls. If vapor suppressants are used to reduce VOC emissions, the owner or operator shall determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in Appendix A to Subpart WWWW of 40 CFR Part 63.

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)(2), (3), or (4), as appropriate.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25 and PTIs 02-01988 and P0113968]

- (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), OAC rule 3745-21-25 and PTIs 02-01988 and P0113968]

- (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:

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

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) from Table 1 of Subpart WWWW of 40 CFR Part 63.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0113968]

e) Reporting Requirements

- (1) The permittee shall submit semiannual 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:



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§63.5905(b)	15-day notification of change(s)
§63.5910(a) – (b) and Table 14	semiannual compliance reports
§63.5910(c) – (i) and Table 14	content of semiannual compliance reports
§63.5895(d)	list individual resins and gelcoats and application methods in semiannual compliance reports

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW and PTI P0113968]

- (2) The permittee shall submit semiannual 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)	semiannual compliance reports
OAC rule 3745-21-25 (Q)(3)(a) – (Q)(3)(h)	content of semiannual compliance reports
OAC rule 3745-21-25(O)(2)(c)	list individual resins and gelcoats and application methods in semiannual compliance reports

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25 and PTIs 02-01988 and P0113968]

- (3) The permittee shall submit annual reports that 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 P0113968]

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 P0113968]

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), OAC rule 3745-21-25 and PTIs 02-01988 and P0113968]

c. Emission Limitation:

VOC emissions shall not exceed 7.3 tons/yr.

Applicable Compliance Method:

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

[Authority for term: OAC rules 3745-77-07(C)(1) and PTI P0113968]

g) Miscellaneous Requirements

- (1) None.



6. Emissions Unit Group -RTM - Resin Transfer Molding: P002, P101

EU ID	Operations, Property and/or Equipment Description
P002	Resin transfer molding
P101	Resin Transfer Molding - Cedar St.

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(D)(1)(a) For the avoidance of Prevention of Significant Deterioration (PSD) and non-attainment New Source Review (NSR)	See B.3: facility-wide limit for volatile organic compounds (VOC) emissions.
b.	OAC rule 3745-31-05(A)(3) (PTI: P0114043 for P002) (PTI: P0113967 for P101)	VOC shall not exceed the 1,216 lbs/month and 7.3 tons/yr.
c.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 - 63.5935)	No organic hazardous air pollutants (HAP) emissions standards.
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 - 63.5935)	No work practice standards for this type of closed molding.
e.	40 CFR Part 63.1 – 63.16 (40 CFR 63.5925)	Table 15 to Subpart WWWW - Applicability of General Provisions, Subpart A.
f.	OAC rule 3745-21-25	Excluded from any requirements in this rule, OAC rule 3745-21-25(C)(2)(k).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.



d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records for each emissions unit:

- a. the identification of each resin applied;
- b. weight of each resin applied;
- c. the percent of VOC monomer(s), by weight, of each resin applied (e.g., styrene, vinyl toluene and/or methyl methacrylate); and
- d. the total VOC emission rate from all resin applied, as calculated by the following equation, in pounds per month:

$$\text{VOC} \left(\frac{\text{lbs}}{\text{month}} \right) = \text{EF} \sum_i^n [(W)(P)]_i$$

where:

W = the weight of each resin applied, as recorded in d)(1)b;

P = the percent of VOC monomer, by weight, of each resin applied, as recorded in d)(1)c;

Note: VOC monomers include all available VOC monomers and available organic HAP monomers in each mold compound (e.g., styrene, vinyl toluene, methyl methacrylate, and etc.). The product [(W)(P)] is the amount of VOC monomers, in tons, of each resin employed.

i = a specific resin applied during the month;

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

EF = emissions factor:

$$\text{EF} = 30 \text{ lbs of VOC emissions emitted} / \text{tons of VOC monomer input}$$

[0.015 lb of VOC emissions emitted / lb of VOC monomer input, ANSI/ACMA/ICPA UEF-1-2011a, Estimating Emission Factors from Open Molding and Other Composite Processes

$$(0.015 \text{ lb VOC/lb monomer input}) \times 2000 \text{ lbs/ton} = \text{EF} (30 \text{ lbs VOC /tons VOC monomer input})$$

[Authority for term: OAC rule 3745-77-07(C)(1) and PTIs P0114043 and P0113967]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that 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 P0114043 and P0113967]

- (2) The permittee shall submit annual reports that 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 P0114043 and P0113967]

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:

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

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) 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 P0114043 and P0113967]

g) Miscellaneous Requirements

- (1) None.



7. Emissions Unit Group -Surface Coating: R003, R004, R005, R006, R007, R010, R011

EU ID	Operations, Property and/or Equipment Description
R003	Surface Coating
R004	Surface Coating
R005	Surface Coating
R006	Surface Coating
R007	Surface Coating
R010	Surface Coating
R011	Surface Coating

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(D)(1)(a) For the avoidance of Prevention of Significant Deterioration (PSD) and non-attainment New Source Review (NSR)	See B.3: facility-wide limit for volatile organic compounds (VOC) emissions.
b.	OAC rule 3745-31-05(A)(3) (PTI: 02-01988m1 for R003 – R007, and R010)	The Best Available Technology (BAT) Determination is compliance with the applicable OAC rule.
c.	ORC 3704.03(T) (PTI: P0114070 for R011)	The BAT determination is compliance with 40 CFR Part 63, Subpart PPPP.
d.	40 CFR, Part 63, Subpart PPPP (40 CFR 63.4480 - 63.4581) [In accordance with 40 CFR 63.4482(e), this is an existing affected source, having coating operations at an existing reinforced plastic composites production facility.]	For each existing general use coating source, limit organic hazardous air pollutant (HAP) emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period. [40 CFR 63.4490(a)(1)] See b)(2)a and b)(2)b.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR 63.1 – 63.16 (40 CFR 63.4501)	Table 2 to Subpart PPPP of 40 CFR, Part 63 – Applicability of General Provisions to Subpart PPPP shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.
f.	OAC rule 3745-17-11(C)	See c)(1), c)(2), and d)(4) through d)(8).
g.	OAC rule 3745-21-07(M)(3)	None. See b)(2)c.

(2) Additional Terms and Conditions

a. The permittee must include all coating (as defined in 40 CFR 63.4581), thinners and/or other additives, and cleaning materials used in this emissions unit when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in section b)(1)d above. To make this determination, the permittee must use at least one of the following compliance operations. The permittee may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. The permittee may use different compliance options for different coating operations or at different times on the same coating operation. The permittee may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, the permittee may not use different compliance options at the same time on the same coating operations. If the permittee switches between compliance options for any coating operation or group of coating operations, the permittee must document this switch as required by 40 CFR 63.4530 (c), the permittee must report it in the next semiannual compliance report required in section 40 CFR 63.4520.

i. Compliant material option:

Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in section b)(1)d above, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee must meet all the requirements of 40 CFR 63.4540, §63.4541, and §63.4542 to demonstrate compliance with the applicable emission limit using this option.

ii. Emission rate without add-on controls options.

Demonstrate that, based on the coatings, thinners and/or, other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emissions limit in section b)(1)d above, calculated as a rolling



12-month emission rate and determined on a monthly basis. The permittee must meet all the requirements of 40 CFR 63.4550, §63.4551, and §63.4552 to demonstrate compliance with the emission limit using this option.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR 63.4491(a) – (b)]

- b. The permittee must be in compliance with the emission limitations in section b)(1)d above at all times.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR 63.4500(a)(1) and PTI P0114070]

- c. The requirements of OAC rule 3745-21-07(M) are not applicable because there is no control device for the VOC emissions associated with this emissions unit.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer’s recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-17-11(C)(1), OAC rule 3745-17-11(C)(2)(b), OAC rule 3745-77-07(A)(1) and PTI P0114070]

- (2) In the event the particulate filter system is not operating in accordance with the manufacturer’s recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[Authority for term: OAC rule 3745-17-11(C)(2)(e), OAC rule 3745-77-07(A)(1) and PTI P0114070]

d) Monitoring and/or Recordkeeping Requirements

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

§63.4530	What records must I keep?
§63.4530(a)	copy of compliance notification(s) and report(s)
§63.4530(b)	records of all data used to determine mass fraction of organic HAP during each compliance period
§63.4530(c)	records of calculations for compliant material option; records of calculations for emission rate without add-on controls option



§63.4530(d)	records of name and mass of each coating, thinner and/or other additive, and cleaning materials used during each compliance period
§63.4530(e)	records of the mass fraction of the organic HAP for each coating, thinner, and/or other additive and cleaning material used during each compliance period
§63.4530(f)	records of the mass fraction of the coating solids for each coating used during each compliance period
§63.4530(g)	if using an allowance, records of waste shipping and credits
§63.4531(a) – (c)	record keeping format and retention requirements

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart PPPP and PTI P0114070]

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

§63.4542	How do I demonstrate continuous compliance with the emission limitations?
§63.4542(a)	Use equation 1 of §63.4541, demonstrate that no coating used exceeded applicable limit in §63.4490; as determined according to §63.4541(a), use no thinner and/or other additive, or cleaning material that contained organic HAP
§63.4552(a)	To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to §63.4551(a) through (g), must be less than or equal to the applicable emission limit in §63.4490. a compliance period consists of 12-months.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart PPPP and PTI P0114070]

- (3) The permittee shall maintain the following monthly records for each emissions unit:
- a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. volatile organic compounds (VOC) content of each coating and cleanup employed, as expressed in a weight percent; and
 - d. the total VOC emission rate for all coating and cleanup employed, as calculated by the following equation, in pounds per month:

$$\text{VOC} \left(\frac{\text{lbs}}{\text{month}} \right) = (\text{CVOC, A})(\text{Total of all coatings}) + \sum_1^n [(\text{VOC})(\text{Cleanup usage})](i)$$

where:



CVOC,A = the average weighted VOC content of all coatings employed during each rolling, 12-month average, as calculated in B.6.a)(8)(b), in lbs VOC/gal of coatings (CVOC,A shall be re-calculated each month, using the current month's coating data along with the coating data from the previous 11-months);

Total of all coatings = total of all coatings employed each month, in gallons/month;

VOC = VOC content of the each cleanup material employed (i), in lbs VOC/gallon cleanup;

Cleanup usage = the amount of each cleanup materials employed (i), in gallons of cleanup;

i = each cleanup material employed; and

n = total number of cleanup materials employed.

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

- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC 3745-17-11(C)(2)(a), OAC rule 3745-77-07(C)(1) and PTI P0114070]

- (5) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-17-11(C)(2)(c), OAC rule 3745-77-07(C)(1) and PTI P0114070]

- (6) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-17-11(C)(2)(c), OAC rule 3745-77-07(C)(1) and PTI P0114070]



- (7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rule 3745-17-11(C)(2)(d) and (f), OAC rule 3745-77-07(C)(1) and PTI P0114070]

- (8) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer’s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-17-11(C)(2)(e), (f) and (g), OAC rule 3745-17-11(C)(1), OAC rule 3745-77-07(C)(1) and PTI P0114070]

e) Reporting Requirements

- (1) The permittee shall submit semiannual 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 PPPP, pursuant to the following sections:

§63.4510	What notifications must I submit?
§63.4520	semiannual compliance reports
§63.4520(a)(3) – (a)(6) §63.4542(b), 63.4552(b)	content of semiannual compliance reports: the identification of compliance method option used for the reporting period, if compliance method options are switched include beginning and ending dates; if using emission rate without add-on control option (§63.4491(b)), provide the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period; report deviations of compliant material option, report deviations of emission rate without add-on controls option



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§63.4542(c) For compliant coating option	As part of semiannual report, provide a statement that the coatings used during the reporting period were in compliance the applicable organic HAP emission limit in §63.4490 during the reporting period; and that no thinner, and/or other additive, or cleaning material used contained organic HAP, determined in accordance with §63.4541(a).
63.4552(c) For emission rate without add-on controls option	As part of semiannual report, provide a statement that the coating operation was in compliance with the emissions limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in §63.4490, determined according to §63.4551(a) through (g).

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart PPPP and PTI P0114070]

- (2) The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer’s recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

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), OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and PTI P0114070]

- (3) The permittee shall submit annual reports that 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 P0114070]

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:

For each existing general use coating source, limit organic HAP emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.



Draft Title V Permit
Hadlock Plastics LLC
Permit Number: P0110110
Facility ID: 0204030272

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Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.4490(a)(1) and PTI P0114070]

g) Miscellaneous Requirements

(1) None.