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

11/26/2013

Certified Mail

Samuel Patrick
Plas-Tanks Industries, Inc.
39 Standen Drive
Hamilton, OH 45015-2209

Facility ID: 1409040850
Permit Number: P0115145
County: Butler

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, Journal News. 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

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219

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 Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
SWOAQA; Indiana; Kentucky

PUBLIC NOTICE
11/26/2013 Issuance of Draft Air Pollution Title V Permit

Plas-Tanks Industries, Inc.
39 Standen Drive,
Hamilton, OH 45015-2209
Butler County
FACILITY DESC.: All Other Plastics Product Manufacturing
PERMIT #: P0115145
PERMIT TYPE: Renewal
PERMIT DESC: Renewal of Title V Operating Permit for Plas-Tanks Industries, a manufacturer and fabricator of fiberglass tanks, including six fiberglass tank fabrication stations.

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

# Statement of Basis For Air Pollution Title V Permit

| | |
|---|---|
| Facility ID: | 1409040850 |
| Facility Name: | Plas-Tanks Industries, Inc. |
| Facility Description: | Fabricator of fiberglass tanks |
| Facility Address: | 39 Standen Drive, Hamilton, OH 45015-2209 |
| Permit #: | P0115145, Renewal |

This facility is subject to Title V because it is major for:

☐ Lead ☐ Sulfur Dioxide ☐ Carbon Monoxide ☐ Volatile Organic Compounds ☐ Nitrogen Oxides
☐ Particulate Matter ≤ 10 microns ☒ Single Hazardous Air Pollutant ☒ Combined Hazardous Air Pollutants
☒ Maximum Available Control Technology Standard(s) ☐ GHG ☐ Title IV

**A. Standard Terms and Conditions**

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

| | |
|---|---|
| Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D) | N/A |
| Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E) | This permit contains terms and conditions for emissions units P001-P006 which were established in PTI P0110881, issued 11/2/2012, and incorporated into the Title V operating permit via a significant permit modification, issued final on 4/1/2013. There are no changes to the terms and conditions for P001-P006 in this permit renewal. |
| Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C. | N/A |

## B. Facility-Wide Terms and Conditions

| Term and Condition (paragraph) | Basis | | Comments |
|---|---|---|---|
| | SIP (3745- ) | Other | |
| B.2. | N | N | No insignificant emissions units at this facility. |
| B.3. | N | 40 CFR Part 63, Subpart WWWW | Permittee is subject to 40 CFR Part 63, Subpart WWWW for Reinforced Plastic Composites Production. Affected emissions units: P001 through P006. |

## C. Emissions Unit Terms and Conditions

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

| EU(s) | Limitation | Basis | ND | OR | M | ENF | R | Rp | ET | St | Misc | Comments |
|---|---|---|---|---|---|---|---|---|---|---|---|---|

| | | SIP (3745- ) | Other | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| P001 – P006 | Organic compound (OC) emissions shall not exceed 64 tons per year (TPY), as a rolling 12-month summation, from cleanup materials | N | ORC 3704.03(T) | N | N | Y | Y | Y | Y | N | N | N | ENF: Enforcement action due to failure to maintain coating and cleanup usage records specifies EUs P001-P006 must utilize resin, gel coat, and solvent metering and measuring devices, including calibration and accuracy verifications, record keeping, and reporting.<br>ET: Compliance with emission limitation determined by monitoring and record keeping requirements. |
| P001 – P006 | Volatile organic compound (VOC) emissions shall not exceed 95 TPY, as a rolling 12-month summation | N | OAC 3745-31-05(D) | N | Y | Y | N | Y | Y | N | N | N | OR: Emissions units P001-P006, combined, have annual resin and gel coat usage restrictions to ensure compliance with emission limitation. Resin and gel coat monitoring, record keeping and reporting requirements are included to determine compliance.<br>ET: Compliance with emission limitation determined by monitoring and record keeping requirements. |

| | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| P001 – P006 | Table 3 of Subpart WWWW – HAP Emission Limitations for Open Molding | N | 40 CFR Part 63 Subpart WWWW | N | Y | Y | N | Y | Y | N | N | N | OR: Emissions units P001-P006 are required to utilize compliance demonstration options pursuant to Subpart WWWW 63.5810 which depend on the resins and gel coats employed and the method(s) of application. Applicable monitoring, record keeping and reporting requirements from Subpart WWWW will ensure compliance.<br>ET: Compliance with emission limitations determined by monitoring and record keeping requirements pursuant to Subpart WWWW. |
| P001 – P006 | Cleanup material employed shall not exceed 6.6 pounds of OC per gallon | N | ORC 3704.03(T) | N | N | Y | N | Y | Y | N | N | N | ET: Compliance with emission limitation determined by monitoring and record keeping requirements. US EPA Method 24 or formulation data shall be used to determine OC content of cleanup material. |

# DRAFT

# Division of Air Pollution Control
# Title V Permit
for
Plas-Tanks Industries, Inc.

| | |
|---|---|
| Facility ID: | 1409040850 |
| Permit Number: | P0115145 |
| Permit Type: | Renewal |
| Issued: | 11/26/2013 |
| Effective: | To be entered upon final issuance |
| Expiration: | To be entered upon final issuance |

**Division of Air Pollution Control**
**Title V Permit**
for
Plas-Tanks Industries, Inc.

**Table of Contents**


Authorization ..... 1

A. Standard Terms and Conditions ..... 2

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

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations ..... 15
30. Submitting Documents Required by this Permit ..... 16
B. Facility-Wide Terms and Conditions..... 17
C. Emissions Unit Terms and Conditions ..... 19
1. Emissions Unit Group -Fabrication Stations #1 - #6: P001, P002, P003, P004, P005, and P006 ..... 20

# Authorization

| | |
|---|---|
| Facility ID: | 1409040850 |
| Facility Description: | Fabricator of fiberglass tanks |
| Application Number(s): | A0047975 |
| Permit Number: | P0115145 |
| Permit Description: | Renewal of Title V Operating Permit for Plas-Tanks Industries, a manufacturer and fabricator of fiberglass tanks, including six fiberglass tank fabrication stations. |
| Permit Type: | Renewal |
| Issue Date: | 11/26/2013 |
| Effective Date: | To be entered upon final issuance |
| Expiration Date: | To be entered upon final issuance |
| Superseded Permit Number: | P0111327 |

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

Plas-Tanks Industries, Inc.
39 Standen Drive
Hamilton, OH 45015-2209

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

# 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 For State-Only Requirements

(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

(5) Standard Term and Condition A. 30.

*(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 recordingsfor 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 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 submittedscheduled maintenancerequests, 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 submitted promptly to the Southwest Ohio Air Quality Agency. Except as provided below, the written reports shall be submitted 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 to the Southwest Ohio Air Quality 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." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

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

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Southwest Ohio Air Quality Agency unless otherwise specified.

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

**3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From 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) 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 permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with 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 Southwest Ohio Air Quality 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 Southwest Ohio Air Quality 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 on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

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 Southwest Ohio Air Quality 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 Southwest Ohio Air Quality 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 Federal Register 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 is subject to 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.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified 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 operating 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 RequirementsUnder 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 theSouthwest Ohio Air Quality 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 Southwest Ohio Air Quality Agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, 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 RequirementsUnder 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 For State-Only Requirements**

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 Southwest Ohio Air Quality 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 Southwest Ohio Air Quality 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 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 potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

**30. Submitting Documents Required by this Permit**

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event ofan alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Southwest Ohio Air Quality Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

# B. Facility-Wide Terms and Conditions

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

   a) None.

2. There are no insignificant emission units at this facility.

3. The following emission units contained in this permit are subject to 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants (NESHAP) Reinforced Plastic Composites Production: P001, P002, P003, P004, P005, and P006. The complete NESHAP requirements, including the NESHAP General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

   (Authority for term: 40 CFR Part 63)

# C. Emissions Unit Terms and Conditions

## 1. Emissions Unit Group -Fabrication Stations #1 - #6: P001, P002, P003, P004, P005, and P006

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| P001 | Station 1 - Fiberglass tank fabrication using spray, filament winding, and hand layup |
| P002 | Station 2 - Fiberglass tank fabrication using spray, filament winding, and hand layup |
| P003 | Station 3 - Fiberglass tank fabrication using spray, filament winding, and hand layup |
| P004 | Station 4 - Fiberglass tank fabrication using spray, filament winding, and hand layup |
| P005 | Station 5 - Fiberglass tank fabrication using spray, filament winding, and hand layup |
| P006 | Station 6 - Fiberglass tank fabrication using spray, filament winding, and hand layup |

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. | ORC 3704.03(T)<br>Best Available Technology<br><br>[PTI P0110881, issued 11/2/2012] | For the application of coating materials (resins and gel coats), the requirements of this rule shall be demonstrated by compliance with the requirements of 40 CFR Part 63, Subpart WWWW, for open molding processes.<br><br>Organic compound (OC) emissions shall not exceed 64 tons per year (TPY), as a rolling 12-month summation, from cleanup materials employed in emissions units P001, P002, P003, P004, P005, and P006, combined.<br><br>See b)(2)a. and c)(1). |
| b. | OAC rule 3745-31-05(D)<br><br>Federally-Enforceable Limitations to Avoid Major Stationary Source Status under New Source Review | Volatile organic compound (VOC) emissions shall not exceed 95 tons per year (TPY), as a rolling 12-month summation, from emissions units P001, P002, P003, P004, P005, and P006, combined.<br><br>See c)(2). |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| c. | OAC rule 3745-21-25<br><br>Reasonably Available Control Technology Requirements for Reinforced Plastic Composites Production | The requirements of this rule are equivalent to, or less stringent than, the requirements established pursuant to 40 CFR Part 63, Subpart WWWW, ORC 3704.03(T), and OAC rule 3745-31-05(D).<br><br>The permittee has submitted the required applicability notification pursuant to OAC rule 3745-21-25(S). |
| d. | 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)<br><br>[In accordance with 63.5805(b), each emissions unit is an open molding corrosion resistant and/or high strength resin and gel coat operation at an existing reinforced plastic composites production facility subject to the emission limitations and work practices specified in 40 CFR 63.5805(b)] | Table 3 to 40 CFR Part 63, Subpart WWWW - Organic Hazardous Air Pollutant (HAP) Emission Limits for Specific Open Molding, Centrifugal Casting, Pultrusion, and Continuous Lamination/Casting Operations shows which emission limits apply to each emissions unit based upon the type of operation and the method of resin and gel coat application.<br><br>See b)(2)b. for a listing of the specific emission limitations and c)(4) for compliance demonstration options.<br><br>Table 4 to 40 CFR Part 63, Subpart WWWW- Applicable Work Practice Standards.<br><br>See c)(1) and c)(3). |
| e. | 40 CFR 63.1-15, Subpart A<br>(40 CFR 63.5925) | Table 15 to 40 CFR Part 63, Subpart WWWW – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR Part 63.1-15 apply. |

(2) Additional Terms and Conditions

a. The maximum OC content of the cleanup material employed in emissions units P001, P002, P003, P004, P005, and P006 shall not exceed 6.6 pounds of OC per gallon.

b. The following organic HAP emission limitations shall not be exceeded:

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

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

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

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

c) Operational Restrictions

(1) The permittee shall employ only non-HAP/non-VOC-containing cleanup materials (i.e. acetone or other compliant material) in each emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1), ORC 3704.03(T), and 40 CFR Part 63, Subpart WWWW Table 4)

(2) The coating materials employed in emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed the following:

a. 3,415,620 pounds of resin based upon a rolling 12-month summation; and

b. 71,045 pounds of gel coat, based upon a rolling 12-month summation.

The emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-monthsummation of the coating material usage upon issuance of this permit.

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

(3) The permittee shall keep containers that store HAP-containing coating materials and cleanup materials closed or covered, except during the addition or removal of materials.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart WWWW Table 4)

(4) The permittee shall utilize one or more compliance options, as specified in 40 CFR 63.5810 to demonstrate compliance with the emission standards for open molding in Table 3 of this subpart, as described in the following sections:

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

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, and P006, combined:

a. The company identification for each coating material (resin and gel coat) applied;

b. The type of each resin and gel coat applied (non-vapor suppressed or vapor suppressed);

c. The number of pounds of each resin and gel coat applied by each method of application (i.e. manual, atomized mechanical, non-atomized mechanical, etc.);

d. The total monthly usage rates for all resins and all gel coats applied, in pounds per month [summation of the resin and gel coat usage as recorded in d)(1)c. above];

e. The rolling, 12-month summations of the monthly total resin usage and total gel coat usage, in pounds [summations of the coating material usage, as recorded in d)(1)d. above, for the present month plus the previous 11 months of operation];

f. The total weight percent of organic HAP of each resin and gel coat applied;

g. The calculated VOC (assumed equal to the organic HAP) emission factor using the equations to calculate organic HAP emission factors from Table 1 of 40 CFR Part 63, Subpart WWWW, in pounds of VOC per ton of resin or gel coat applied;

h. The total monthly VOC emission rate for all resins and gel coats applied, in pounds per month; and

i. The rolling,12-month summation of the monthly VOC emission rate, in tons [summation of the VOC emissions, as recorded in d)(1)h. above, for the present month plus the previous 11 months of operation, divided by 2,000 pounds].

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

(2) The permittee shall collect and record the following cleanup material information each month for emissions units P001, P002, P003, P004, P005, and P006, combined:

a. The company identification for each cleanup material employed;

b. The total number of gallons (or pounds as specified in d)(2)g. below) of cleanup material evaporated each month in emissions units P001, P002, P003, P004, P005, and P006, combined. Evaporated cleanup material is equal to [the amount of virgin solvent dispensed plus recycled cleanup solvent in inventory from the previous month] minus [the recycled cleanup solvent in inventory at the end of the month plus solvent contained in any cleanup solvent related waste sent offsite for disposal.];

c. The OC content of the cleanup material, in pounds per gallon;

d. The monthly OC emission rate from cleanup materials evaporated, in pounds per month [d)(2)b. x d)(2)c.];

e. The rolling,12-month summation of the monthly OC emission rate from cleanup materials employed, in tons [summation of the OC emissions, as recorded in d)(2)d. above, for the present month plus the previous 11 months of operation, divided by 2,000 pounds];

f. A record of each liquid organic cleanup material employed in this emissions unit indicating whether or not the liquid organic material contains VOCs or HAPs as identified in Section 112(b) of the Clean Air Act;

g. The permittee may record the evaporation of cleanup materials in pounds per month, instead of gallons as specified in d)(2)b. above, if the cleanup materials are weighed; and

h. The permittee shall retain records of analyses for the organic solvent and solids content of cleanup solvent related waste sent off site for disposal.

i. The total number of gallons or pounds of any cleanup solvent related waste sent offsite for disposal.

The permittee has existing cleanup material records; therefore, cumulative cleanup material emission limitations are not needed for the first year of operation after issuance of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), ORC 3704.03(T), and 40 CFR Part 63, Subpart WWWW)

(3) The permittee shall operate and maintain metering equipment to measure the amount of all resins and gel coats used in each emissions unit. The permittee shall calibrate the metering equipment to measure the amount, in weight or volume, of all resins and gel coats used in each emissions unit as necessary or appropriate to maintain the accuracy of the measurements guaranteed or specified by the manufacturer of the metering equipment, or to an accuracy of within plus or minus five percent (5%) of the true value, whichever is more stringent.

Calibration and accuracy tests consistent with the metering equipment manufacturer specifications shall be conducted semi-annually. If the manufacturer does not warrant or specify the calibration data or the accuracy of the material measurements for the metering equipment, the permittee shall perform calibration and accuracy tests on the metering equipment on a monthly basis during the first six months of operation of the meters. The permittee calibration and accuracy tests for the metering equipment shall include two resins (the highest and lowest density resins) and two gel coats (the highest and lowest density gel coats). After completing six months of calibration and accuracy tests of the metering equipment and upon approval from the Southwest Ohio Air Quality Agency, the permittee shall conduct calibration and accuracy tests semi-annually.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule ORC 3704.03(T))

(4) The permittee shall operate and maintain measuring equipment to measure the amount of cleanup materials employed in emissions units P001 through P006. The permittee shall calibrate the measuring equipment to measure the amount, in weight or volume, of all cleanup materials employed in emissions units P001 through P006 as necessary or appropriate to maintain the accuracy of the measurements guaranteed or specified by the manufacturer of the measuring equipment, or to an accuracy of within plus or minus five percent (5%) of the true value, whichever is more stringent.

Calibration and accuracy tests consistent with the measuring equipment manufacturer specifications shall be conducted semi-annually. If the manufacturer does not warrant or specify the calibration data or the accuracy of the material measurements for the measuring equipment, the permittee shall perform calibration and accuracy tests on the measuring equipment on a monthly basis during the first six months of operation of the measuring equipment. The permittee calibration and accuracy tests for the measuring equipment shall include the cleanup material employed by the permittee. After completing six months of calibration and accuracy tests of the measuring equipment and

upon approval from the Southwest Ohio Air Quality Agency, the permittee shall conduct calibration and accuracy tests semi-annually.

(Authority for term: OAC rule 3745-77-07(C)(1) and ORC 3704.03(T))

(5) When using the compliance demonstration option specified in 63.5810(b) listed in c)(4) above, the permittee shall comply with the following data collection, emission calculation, and record keeping requirements, in addition to those listed in d)(6) below:

a. Group process streams into operation type and resin application method or gel coat type listed in Table 3 to Subpart WWWW. Calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months using the following equation found in 63.5810(b):

$$\text{Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^{n}(\text{Actual Process Stream } EF_i * \text{Material}_i)}{\sum_{i=1}^{n} Material_i} \qquad \text{(Eq. 2)}$$

Where:

Actual Process Stream $EF_i$= actual organic HAP emissions factor for process stream i, lbs/ton;

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

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

b. Compare each organic HAP emissions factor calculated in d)(5)a. above with its corresponding organic HAP emissions limit in Table 3 of Subpart WWWW. Compliance is demonstrated if all emissions factors are equal to or less than their corresponding emission limits.

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 c)(4), the permittee shall collect and record the information specified in 40 CFR 63.5810(a), (c), or (d), as appropriate.

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

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

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

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

(7) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #P0110881, issued on 11/2/2012:d)(1), d)(2), d)(3), d)(4), d)(5), and d)(6). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. An identification of all exceedances of the rolling, 12-month coating material usage limitations for resins and gel coats applied for emissions units P001, P002, P003, P004, P005, and P006, combined;

b. An identification of all exceedances of the rolling, 12-month VOC emission limitation of 95 TPY for emissions units P001, P002, P003, P004, P005, and P006, combined;

c. An identification of any monthly record indicating VOC-containing and/or HAP-containing cleanup material was employed in an emissions unit, and the type of cleanup material employed for each such incident;

d. An identification of all exceedances of the OC content limitation for cleanup materials of 6.6 pounds of OC per gallon; and

e. An identification of all exceedances of the rolling, 12-month OC emission limitation of 64 TPY for cleanup materials employed by emissions units P001, P002, P003, P004, P005, and P006, combined.

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), OAC rule 3745-31-05(D), and ORC 3704.03(T))

(2) Upon replacement and/or initial operation of any metering or measuring equipment as specified in d)(3) and d)(4) of this permit, the permittee shall provide the Southwest Ohio Air Quality Agency the following information: the name of the manufacturer of the metering/measuring equipment, the make and model of the metering/measuring equipment, calibration data (e.g., volume of coating per pump stroke), a copy of the manufacturer's specifications and warranty for the accuracy of the metering/measuring equipment and the actual accuracy of the material measurements (by weight or by volume) recorded for the metering/measuring equipment.

(Authority for term: OAC rule 3745-77-07(C)(1) and ORC 3704.03(T))

(3) The permittee shall submit calibration and accuracy test results for the metering equipment and measuring equipment specified in d)(3) and d)(4) of the terms and conditions of this permit. The calibration and accuracy tests results shall be submitted to the Southwest Ohio Air Quality Agency by January 30 and July 30 of each calendar year, and shall cover the previous six-month period.

(Authority for term: OAC rule 3745-77-07(C)(1) and ORC 3704.03(T))

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

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

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

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #P0110881, issued on 11/2/2012: e)(1), e)(2), e)(3), and e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the

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

f) Testing Requirements

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

a. Emission Limitation:

The maximum OC content of the cleanup material employed in emissions units P001, P002, P003, P004, P005, and P006 shall not exceed 6.6 pounds of OC per gallon.

Applicable Compliance Method:

Compliance with the OC content emission limitation for cleanup materials shall be based upon the record keeping specified in d)(2).

U.S. EPA Method 24 or manufacturer formulation data shall be used to determine the OC content of the cleanup materials.

(Authority for term: OAC rule 3745-77-07(C)(1) and ORC 3704.03(T))

b. Emission Limitation:

The maximum annual VOC emissions from emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 95 TPY OC, as a rolling 12-month summation.

Applicable Compliance Method:

Compliance with the rolling 12-month VOC emission limitation shall be based upon the record keeping specified in d)(1).

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

c. Emission Limitation:

The maximum annual OC emissions from cleanup materials employed by emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 64 TPY OC, as a rolling 12-month summation.

Applicable Compliance Method:

Compliance with the rolling 12-month OC emission limitation for cleanup materials employed shall be based upon the record keeping specified in d)(2).

(Authority for term: OAC rule 3745-77-07(C)(1) and ORC 3704.03(T))

d. Emission Limitation:

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

Applicable Compliance Method:

Compliance with the organic HAP emission limitations found in 40 CFR Part 63, Subpart WWWW, shall be based upon the compliance demonstration utilized by the permittee as specified in c)(4) of this permit and the record keeping specified in 40 CFR Part 63.5780-5935 and d)(1) of this permit.

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

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

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

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

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #P0110881, issued on 11/2/2012: f)(1)a., f)(1)b., f)(1)c., f)(1)d, and f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.