John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

3/26/2014

Certified Mail

Facility ID: 0124010112
Permit Number: P0109469
County: Fayette

Roger Mola
Fiber-Tech Industries Inc
2000 Kenskill Avenue
Washington Courthouse, OH 43160

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is a finalOhio Environmental Protection Agency (EPA) Air Pollution Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this Title V permit is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Central District Office as indicated on page one of your permit.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA DAPC, Central District Office

FINAL

Division of Air Pollution Control
Title V Permit
for
Fiber-Tech Industries Inc

Facility ID:	0124010112
Permit Number:	P0109469
Permit Type:	Renewal
Issued:	3/26/2014
Effective:	4/16/2014
Expiration:	4/16/2019

Division of Air Pollution Control
Title V Permit
for
Fiber-Tech 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 6
4. Risk Management Plans 7
5. Title IV Provisions 7
6. Severability Clause 7
7. General Requirements 7
8. Fees 8
9. Marketable Permit Programs 8
10. Reasonably Anticipated Operating Scenarios 9
11. Reopening for Cause 9
12. Federal and State Enforceability 9
13. Compliance Requirements 9
14. Permit Shield 11
15. Operational Flexibility 11
16. Emergencies 12
17. Off-Permit Changes 12
18. Compliance Method Requirements 12
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 13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only 14
25. Records Retention Requirements Under State Law Only 14
26. Inspections and Information Requests 14
27. Scheduled Maintenance/Malfunction Reporting 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. P004, Rogers Saw 20
2. P009, Trough Drying Cabinet 23
3. R001, Gelcoat 27
4. Emissions Unit Group -Lamination Tables: R003,R004,R005,R006,R007,R008, ... 42
5. Emissions Unit Group -Saw 1 & 2: P002,P003, ... 50

Authorization

Facility ID:	0124010112
Facility Description:	Lamination Plant
Application Number(s):	A0040133, A0043777
Permit Number:	P0109469
Permit Description:	Title V renewal operating permit for a reinforced fiberglass manufacturing facility including panel cutting saws, lamination tables, and gel coat spray booths.
Permit Type:	Renewal
Issue Date:	3/26/2014
Effective Date:	4/16/2014
Expiration Date:	4/16/2019
Superseded Permit Number:	P0082534

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

Fiber-Tech Industries Inc
2351 Kenskill Avenue
Washington Court House, OH 43160

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

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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, Central 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 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

Craig W. Butler
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 Ohio EPA DAPC, Central District Office. 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 Ohio EPA DAPC, Central District Office 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 Ohio EPA DAPC, Central District Office 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

Officialthat, 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 Ohio EPA DAPC, Central District Office 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 Ohio EPA DAPC, Central District Office) 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 Ohio EPA DAPC, Central District Office 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 Ohio EPA DAPC, Central District Office 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 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 theOhio EPA DAPC, Central District Office.

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 Ohio EPA DAPC, Central District Office. 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 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 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 Ohio EPA DAPC, Central District Office 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 Ohio EPA DAPC, Central District Office 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 Ohio EPA DAPC, Central District Office, 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. The following emissions units contained in this permit are subject to 40 CFR Part 63,subpartWWWW: L001, P009, R001, R003, R004, R005, R006, R007, R008, T001, T002, T003, and T004. 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 Central District Office.

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

EU ID	Operations, Property and/or Equipment Description	
B001	5.5 MMBtu/hr natural gas-fired space heater	PTI 01-2657
L001	Cold cleaner (fka: Z009)	40 CFR Part 63, subpart WWWW
T001	10,500 gallon resin storage tank with submerged fill	40 CFR Part 63, subpart WWWW
T002	10,500 gallon resin storage tank with submerged fill	40 CFR Part 63, subpart WWWW
T003	10,500 gallon resin storage tank with submerged fill	40 CFR Part 63, subpart WWWW
T004	10,500 gallon resin storage tank with submerged fill	40 CFR Part 63, subpart WWWW

C. Emissions Unit Terms and Conditions

1. P004, Rogers Saw

Operations, Property and/or Equipment Description:

Panel cutting saw (Rogers saw)

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 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(3)	Particulate emissions (PE) shall not exceed 6.5 pounds per hour from emissions units P002, P003 and P004 combined. See b)(2)a.

(2) Additional Terms and Conditions

a. The permittee demonstrated compliance with the combined PE limitation through performance tests conducted on June 28, 2007; therefore, it is not necessary to establish monitoring, recordkeeping, or reporting requirements to ensure compliance with this limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to eliminate the visible emissions.

[Authority for term: OAC rules 3745-17-11(B) and 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rules 3745-17-11(B) and 3745-77-07(C)(1)]

(3) The permittee shall also submit annual reports that specify the total particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for term: OAC rules 3745-17-11(B) and 3745-77-07(C)(1)]

(4) The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

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

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:

Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions shall not exceed 6.5 pounds per hour for emissions units P002, P003 and P004 combined.

Applicable Compliance Method:

The facility demonstrated compliance with the 6.5 pounds per hour particulate emissions limitation during performance tests conducted on June 28, 2007 (3.09 pounds per hour).

If required, the permittee shall demonstrate compliance with the applicable PE limitation identified in OAC rule 3745-17-11(B)(3), through emissions tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(10). Pursuant to OAC rule 3745-17-11(A)(3), if required, the performance test shall be conducted while emissions units P002, P003, and P004 are operating.

[Authority for term: OAC rules 3745-17-07(A)(1), 3745-17-11(B)(1), and 3745-77-07(C(1)]

g) Miscellaneous Requirements

(1) None.

2. P009, Trough Drying Cabinet

Operations, Property and/or Equipment Description:

Trough drying cabinet

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 3745-21-25(D)(1)	See b)(2)a.
b.	40 CFR Part 63, subpart WWWW	See b)(2)b.
c.	40 CFR Part 63, subpart A (40 CFR Part 63.1-16)	See b)(2)c.

(2) Additional Terms and Conditions

a. The following work practice standards from table 1 of OAC rule 3745-21-25 apply to this emissions unit:

Type of operation	Work practice standards
Cleaning operation (cleaning of equipment used in reinforced plastic composites manufacture)	Do not use cleaning solvents (cleaners) that 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. Application equipment includes any equipment that directly contacts resin.

b. The following work practice standards from table 4 of subpart WWWW apply to this emissions unit:

Type of operation	Work practice standards
Cleaning operation (cleaning of equipment used in reinforced plastic composites manufacture)	Do not use cleaning solvents (cleaners) that contain HAP, except that styrene may be used 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.

c. Table 15 to subpart WWWW of 40 CFR Part 63 - "Applicability of General Provisions (subpart A) to subpart WWWW of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, subpart WWWW and subpart A.

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each day for the trough drying operation for the purpose of calculating the annual VOC emissions threshold:

a. The company identification for each resin employed;

b. The number of 98" troughs charged to the drying cabinet;

c. The daily VOC emissions from the 98" troughs charged to the drying cabinet, in pounds, i.e., the number of 98" troughs charged times 0.139 lbs VOC/trough(The 98” trough emissions factor was determined through emissions tests performed on February 13, 2007, and April 4, 2013);

d. The number of120" troughs charged to the drying cabinet;

e. The daily VOC emissions from the 120" troughs charged to the drying cabinet, in pounds, i.e., the number of 120" troughs charged times 0.172 lbs VOC/trough(The 120” trough emissions factor was determined through emissions tests performed on February 13, 2007, and April 4, 2013); and

f. The total daily VOC emissions from all troughs charged to the drying cabinet, in pounds, i.e., d)(1)c. + d)(1)e.

The permittee is required to determine a trough-specific VOC emissions factor for each trough type (size) charged in the trough drying cabinet. In the event that a trough other than a 98" trough or 120" trough is to be charged, the permittee shall first perform gravimetric testing on the alternative trough type (size). Proper testing notification is required prior to performing the gravimetric tests. The gravimetric testing shall be consistent with the procedures and methods specified in the "Intent to Test" dated February 28, 1994.

[Authority for term: OAC rules 3745-21-25(F)(3) and 3745-77-07(C)(1)]

(2) The permittee shall maintain the records necessary to demonstrate compliance with the applicable work practice standards for OAC rule 3745-21-25 in accordance with OAC rules 3745-21-25(E), 3745-21-25(G), 3745-21-25(O) and 3745-21-25(P).

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

(3) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, subpart WWWW and subpart A.

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

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit semi-annual compliance status reports in accordance with OAC rule 3745-21-25(Q).

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

(3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, subpart WWWW and subpart A.

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

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. <u>Emission Limitation:</u>

The permittee shall comply with the applicable work practice standards from table 1 of OAC rule 3745-21-25 for cleaning operations.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the applicable work practice standards from table 1 of OAC rule 3745-21-25 in accordance with OAC rule 3745-21-25(O).

b. Emission Limitation:

The permittee shall comply with the applicable work practice standards from table 4 of subpart WWWW for cleaning operations.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the applicable work practice standards from table 4 of subpart WWWW in accordance with 40 CFR Part 63.5900.

g) Miscellaneous Requirements

(1) None.

3. R001, Gelcoat

Operations, Property and/or Equipment Description:

Gelcoating operation controlled with primary and secondary enclosures and a catalytic incinerator.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [PIT P0106762]	Volatile organic compound (VOC) emissions from gelcoat application and VOC-containing cleanup materials shall not exceed 14.7 pounds per hour. VOC emissions from gelcoat application and VOC-containing cleanup materials shall not exceed 27.8 tons per year. See b)(2)a. through b)(2)e.
b.	OAC rule 3745-21-25(D)(1)	See b)(2)f.
c.	OAC rule 3745-21-25(D)(4)	See b)(2)g.
d.	40 CFR Part 63, subpart WWWW	See b)(2)h. and b)(2)i.
e.	40 CFR Part 63, subpart A (40 CFR Part 63.1-16)	See b)(2)j.

(2) Additional Terms and Conditions

a. The catalytic incinerator controlling VOC emissions from this emissions unit shall operate with a minimum destruction efficiency of 94.7%.

b. VOC emissions from this emissions unit shall be reduced overall by a minimum of 80.5%.

c. The hood covering the gelcoat spray application process shall remain closed for a minimum of ninety (90) seconds after each spray event.

d. The temperature of the exhaust gases at the inlet to the catalyst bed of the incinerator, when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

e. The secondary enclosure serving this emissions unit shall be employed whenever the emissions unit is in operation. The permittee shall not employ the powered roof ventilator in the secondary enclosure except to ensure that the styrene emission concentrations remain below the Permissible Exposure Limit required by OSHA.

f. The following work practice standards from table 1 of OAC rule 3745-21-25 apply to this emissions unit:

Type of operation	Work practice standards
Cleaning operation (cleaning of equipment used in reinforced plastic composites manufacture)	Do not use cleaning solvents (cleaners) that 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. Application equipment includes any equipment that directly contacts resin.
VOC-containing materials storage operation	Keep 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.
Mixing*	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1.0 inch are permissible around mixer shafts and any required instrumentation.
	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. Vents routed to a ninety-five per cent efficient control device are exempt from this requirement.
	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to

	the mixing vessels.

* Containers of five gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of five hundred square inches or less may be open while active mixing is taking place.

g. In accordance with OAC rule 3745-21-25(D)(4), this emissions unit is subject to the VOC emissions limits in table 2 of OAC rule 3745-21-25 because the facility has reinforced plastic composites production operations and manufactures large reinforced plastic composites parts.

The following VOC emissions limits from table 2 of OAC rule 3745-21-25 apply to this emissions unit:

Type of operation	Resin application method or gel coat type	VOC emissions limit*
Open molding: gel coat**	Tooling gel coat	440 lb/ton
	White/off white pigmented gel coat	267 lb/ton
	All other pigmented gel coat	377 lb/ton
	CR/HS or high performance gel coat	605 lb/ton
	Fire retardant gel coat	854 lb/ton
	Clear production gel coat	522 lb/ton

*VOC 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 on a twelve-month, rolling average.

**If 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.

h. The following work practice standards from table 4 of subpart WWWW apply to this emissions unit:

Type of operation	Work practice standards
Cleaning operation (cleaning of equipment used in reinforced plastic composites manufacture)	Do not use cleaning solvents (cleaners) that contain HAP, except that styrene may be used 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.
VOC-containing materials storage operation	Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
Mixing*	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1.0 inch are permissible around mixer shafts and any required instrumentation.
	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. Vents routed to a ninety-five per cent efficient control device are exempt from this requirement.
	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

* Containers of five gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of five hundred square inches or less may be open while active mixing is taking place.

i. The following HAP emissions limits from table 3 of subpart WWWW apply to this emissions unit:

Type of operation	Resin application method or gel coat type	HAP emissions limit*
Open molding: gel coat**	Tooling gel coat	440 lb/ton
	White/off white pigmented gel coat	267 lb/ton
	All other pigmented gel coat	377 lb/ton
	CR/HS or high performance gel coat	605 lb/ton
	Fire retardant gel coat	854 lb/ton
	Clear production gel coat	522 lb/ton

*Organic HAP emissions limits for open molding and centrifugal casting are expressed as pounds HAP per ton of resin or gel coat (pounds per ton). The operation shall be at or below these values on a twelve-month, rolling average.

**If 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.

j. Table 15 to subpart WWWW of 40 CFR Part 63 - "Applicability of General Provisions (subpart A) to subpart WWWW of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) The catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The conversion efficiency of the catalyst, as determined in **an annual** catalyst activity test, shall be sufficient to meet the destruction efficiency and control efficiency requirements of this permit at a test temperature that is equal to that temperature at which the inlet to the catalyst bed is set. Solvent loading during the catalyst activity test shall be consistent with the test laboratory's normal testing protocol.

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

(2) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, subpart WWWW and subpart A.

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature immediately upstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

(2) The permittee shall perform a weekly inspection of the hood covering the gelcoat spray application process while the emissions unit is operating. At a minimum, the permittee shall document the inspection and record the following information:

a. The name of the person(s) conducting the inspection;

b. The date and time that the inspection was conducted;

c. An indication as to whether the hood lock-out system installed for the purpose of maintaining the hood in a closed position for at least ninety (90) seconds after each spray event is functioning properly and for the minimum amount of time required; and

d. If the system described above is not functioning properly, any actions taken to correct the problem with the hood lock-out system.

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

(3) The permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the emissions unit was in operation and the temperature of the exhaust gases at the inlet to the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation;

c. Any period of time (start time and end time) when the emissions unit was in operation and the powered roof ventilator in the secondary enclosure was employed;

d. The name and identification number of each gelcoat employed;

e. The number of pounds of each gelcoat employed;

f. The styrene content of each gelcoat employed, in percent by weight;

g. The methyl methacrylate content of each gelcoat employed, in percent by weight;

h. The name and identification number of each VOC-containing cleanup material employed;

i. The number of pounds of VOC-containing cleanup materials employed;

j. The VOC content of each VOC-containing cleanup material employed, in percent by weight;

k. The total number of hours the emissions unit was in operation; and

l. The average hourly VOC emission rate for all gelcoats and cleanup materials employed, calculated in accordance with f)(1)a.

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

(4) The permittee shall collect and record the following information for each month:

a. The total VOC emissions, in tons, from all gelcoats and cleanup materials employed;

b. The total VOC emissions, in pounds, for each type of gelcoat identified in Table 2 of OAC rule 3745-21-25;

c. The total quantity applied, in tons, for each type of gelcoat identified in Table 2 of OAC rule 3745-21-25;

d. The actual monthly VOC emissions rate, in pounds of VOC per ton of gelcoat applied, for each type of gelcoat identified in Table 2 of OAC rule 3745-21-25; and

e. The rolling, 12-month VOC emissions rate, in pounds of VOC per ton of gelcoat applied, for each type of gelcoat identified in Table 2 of OAC rule 3745-21-25.

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

(5) The permittee shall maintain the records necessary to demonstrate compliance with the applicable work practice standards and VOC emissions limit(s) for OAC rule 3745-21-25 in accordance with OAC rules 3745-21-25(E), 3745-21-25(G), 3745-21-25(O) and 3745-21-25(P).

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

(6) The permittee shall perform a preventative maintenance inspection of the catalytic incinerator on an **annual** basis to evaluate the performance of the catalyst bed. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations, and shall include a physical inspection of the unit and all of the associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment and the catalyst shall be performed as determined by the inspection. During each **annual** inspection a sample of the catalyst material shall be collected from the catalyst bed and used to perform a catalyst activity test. The permittee shall maintain a record of the results of each **annual** inspection and the results of each **annual** catalyst activity test.

The permittee shall also perform **weekly** inspections of the external integrity of the catalytic incinerator. Records shall be maintained of the inspections and the date(s) of catalyst replacement, and if only partial, the amount or percent of the total catalyst replaced.

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

(7) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, subpart WWWW.

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

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports which identify the following:

a. All 3-hour blocks of time during which the emissions unit was in operation and the temperature of the exhaust gases at the inlet to the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;

b. Any weekly inspection that identified that the hood lock-out system was not functioning properly and for the minimum amount of time required as well as a description of the actions taken to correct the problem with the hood lock-out system;

c. Any day during which the average hourly VOC emission rate for all gelcoats and VOC-containing cleanup materials exceeded 14.7 lbs/hr; and

d. Any rolling, 12-month period during which the VOC emissions rate, in pounds of VOC per ton of gelcoat applied, exceeded the limit established for each type of gelcoat identified in Table 2 of OAC rule 3745-21-25.

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

(3) The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

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

(4) The permittee shall submit annual reports which specify the total VOC emissions from the use of gelcoat and VOC-containing cleanup materials from this emissions unit for the previous year. These reports shall be submitted by April 15 of each year. For this reporting requirement, the permittee may provide the required information through the annual emission fee report, required pursuant to OAC rule 3745-78-02, provided that the emission data in the fee report is emissions unit specific.

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

(5) The permittee shall submit semi-annual compliance status reports in accordance with OAC rule 3745-21-25(Q).

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

(6) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, subpart WWWW and subpart A.

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

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. <u>Emission Limitation:</u>

VOC emissions from gelcoat application and VOC-containing cleanup materials shall not exceed 14.7 pounds per hour.

<u>Applicable Compliance Method:</u>

Compliance shall be determined using the followingequation:

VOC emissions = [(Styrene emissions + Methyl methacrylate emissions) * (Capture efficiency/100) * (1 – Destruction efficiency/100)] + [(Styrene emissions

+ Methyl methacrylate emissions) * (1 - Capture efficiency/100)] + [VOC-containing cleanup material emissions],

where;

Styrene emissions = Emissions rate, in pounds of styrene emitted per ton of gelcoat processed, determined using the recordkeeping required in d)(2)e. and d)(2)f., the monomeric styrene content for each gelcoat and the following table[1]:

Process	**Styrene content in gelcoat, %**	**Pounds of styrene emitted per ton of gelcoat processed**
Gelcoat Controlled Spray Application	<33	(0.325 * %styrene) * 0.90 * 2000
	≥33	{0.73 * [(1.03646 * %styrene) – 0.195] * 2000} - 23

Methyl methacrylate emissions = Emissions rate, in pounds of methyl methacrylate emitted per ton of gelcoat processed, determined using the recordkeeping required in d)(2)e. and d)(2)g., the methyl methacrylate content for each gelcoat and the following table[2]:

Process	**Methyl methacrylate content in gelcoat, %**	**Pounds of methyl methacrylate emitted per ton of gelcoat processed**
Gelcoat Application	1	15
	2	30
	3	45
	4	60
	5	75
	6	90
	7	105
	8	120
	9	135

Process	Methyl methacrylate content in gelcoat, %	Pounds of methyl methacrylate emitted per ton of gelcoat processed
	10	150
	11	165
	12	180
	13	195
	14	210
	15	225
	16	240
	17	255
	18	270
	19	285
	≥20	0.75 * %methyl methacrylate * 2000

Capture efficiency = the capture efficiency of the enclosures determined during the most recent emissions tests that demonstrated the emissions unit was in compliance (82.1% during test conducted April 2 and 3, 2013);

Destruction efficiency = the destruction efficiency of the catalytic incinerator determined during the most recent emissions tests that demonstrated the emissions unit was in compliance (98.1% during test conducted April 2 and 3, 2013); and

VOC-containing cleanup material emissions = Emissions rate, in pounds of VOC emitted per pound of cleanup material used, determined using the recordkeeping required in d)(2)i. and d)(2)j.

The monomeric styrene content and methyl methacrylate content of the gelcoat utilized in this process shall be determined in accordance with the gelcoat supplier's MSDS sheets or manufacturer's specification sheets. If the monomer content is provided by the material supplier or manufacturer as a range, the owner or operator shall use the upper limit of the range for determining compliance. If a separate measurement of the total monomer content, such as an analysis of the material by USEPA method 311 of appendix A to 40 CFR Part 63, exceeds the upper limit of the range of the total monomer content provided by

the material supplier or manufacturer, then the owner or operator shall use the measured monomer content to determine compliance.

The VOC content of the VOC-containing cleanup materials utilized in this process shall be determined in accordance with the cleanup material supplier's MSDS sheets.

1 – The information presented in this table is derived from the American National Standards Institute's (ANSI) *"Estimating Emissions Factors from Open Molding and Other Composite Processes"*, October 13, 2009. The lbs of styrene emitted per ton of gelcoat used emission factor from the table has been adjusted to reflect the site-specific emissions factor established during the most recent compliance demonstration (0.096 lb styrene per lb of gelcoat applied for a gelcoat with 33% styrene content). As referenced in AP-42 Chapter 4.4, table 4.4-2, the most current version of the ANSI document should be used to estimate emissions from polyester resin plastic products fabrication operations. Subsequent revisions to the emissions factors in the ANSI document may require a permit modification.

2 – The information presented in this table is taken from the American National Standards Institute's (ANSI) *"Estimating Emissions Factors from Open Molding and Other Composite Processes"*, October 13, 2009. As referenced in AP-42 Chapter 4.4, table 4.4-2, the most current version of the ANSI document should be used to estimate emissions from polyester resin plastic products fabrication operations. Subsequent revisions to the emissions factors in the ANSI document may require a permit modification.

b. <u>Emission Limitation:</u>

VOC emissions from gelcoat application and VOC-containing cleanup materials shall not exceed 27.8 TPY.

<u>Applicable Compliance Method:</u>

Compliance shall be based upon a summation of the monthly records specified in d)(3)a.

c. <u>Emission Limitation:</u>

VOC emissions shall not exceed the limits established for each type of gelcoat in table 2 of OAC rule 3745-21-25.

<u>Applicable Compliance Method:</u>

The permittee shall demonstrate compliance with the applicable VOC emissions limitations from table 2 of OAC rule 3745-21-25 in accordance with OAC rule 3745-21-25(O) and the recordkeeping required in d)(3)e.

d. Emission Limitation:

The catalytic incineratorcontrolling VOC emissions from this emissions unit shall operate with a minimum destruction efficiency of 94.7% and VOC emissions from this emissions unit shall be reduced overall by a minimum of 80.5%.

Applicable Compliance Method:

Compliance shall be determined in accordance with the testing requirements identified in f)(3) below.

e. Emission Limitation:

The permittee shall comply with the applicable work practice standards from table 1 of OAC rule 3745-21-25 for cleaning operations, materials storage operations, and mixing operations.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the applicable work practice standards from table 1 of OAC rule 3745-21-25 in accordance with OAC rule 3745-21-25(O).

f. Emission Limitation:

The permittee shall comply with the applicable work practice standards from table 4 of subpart WWWW for cleaning operations, materials storage operations, and mixing operations.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the applicable work practice standards from table 4 of subpart WWWW in accordance with 40 CFR Part 63.5900.

g. Emission Limitation:

The permittee shall comply with the applicable organic HAP emissions limitations from table 3 of subpart WWWW for open molding operations.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the applicable organic HAP emissions limitations from table 3 of subpart WWWW in accordance with 40 CFR Part 63.5900.

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

(2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, subpart WWWW and subpart A.

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

(3) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months prior to expiration;

b. The emission testing shall be conducted to demonstrate compliance with the destruction efficiency and overall VOC reduction requirements.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR Part 60, Appendix A, Methods 1 through 4, Method 18, 25 or 25A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

f. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the

proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

h. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

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

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group -Lamination Tables: R003,R004,R005,R006,R007,R008,

EU ID	Operations, Property and/or Equipment Description
R003	Lamination table #1
R004	Lamination table #2
R005	Lamination table #3
R006	Lamination table #4
R007	Lamination table #5
R008	Lamination table #6

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 3745-21-25(D)(1)	See b)(2)a.
b.	OAC rule 3745-21-25(D)(4)	See b)(2)b.
c.	40 CFR Part 63, subpart WWWW	See b)(2)c. and b)(2)d.
d.	40 CFR Part 63, subpart A (40 CFR Part 63.1-16)	See b)(2)e.

(2) Additional Terms and Conditions

a. The following work practice standards from table 1 of OAC rule 3745-21-25 apply to this emissions unit:

Type of operation	Work practice standards
Cleaning operation (cleaning of equipment used in reinforced plastic composites manufacture)	Do not use cleaning solvents (cleaners) that 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. Application equipment includes any equipment that directly contacts resin.
VOC-containing materials storage	Keep containers that store VOC-

Type of operation	Work practice standards
operation	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.
Mixing*	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1.0 inch are permissible around mixer shafts and any required instrumentation.
	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. Vents routed to a ninety-five per cent efficient control device are exempt from this requirement.
	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

* Containers of five gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of five hundred square inches or less may be open while active mixing is taking place.

b. In accordance with OAC rule 3745-21-25(D)(4), this emissions unit is subject to the VOC emissions limits in table 2 of OAC rule 3745-21-25 because the facility has reinforced plastic composites production operations and manufactures large reinforced plastic composites parts.

The following VOC emissions limits from table 2 of OAC rule 3745-21-25 apply to this emissions unit:

Type of operation	Resin application method or gel coat type	VOC emissions limit*
Open molding: corrosion resistant and/or high strength (CR/HS)	Mechanical resin application	113 lb/ton

Open molding: non-CR/HS	Mechanical resin application	88 lb/ton
Open molding: tooling	Mechanical resin application	254 lb/ton
Open molding: low-flame spread/low-smoke products	Mechanical resin application	497 lb/ton
Open molding: shrinkage controlled resins**	Mechanical resin application	354 lb/ton

*VOC 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 on a twelve-month, rolling average.

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

c. The following work practice standards from table 4 of subpart WWWW apply to this emissions unit:

Type of operation	Work practice standards
Cleaning operation (cleaning of equipment used in reinforced plastic composites manufacture)	Do not use cleaning solvents (cleaners) that contain HAP, except that styrene may be used 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.
VOC-containing materials storage operation	Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
Mixing*	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1.0 inch are permissible around mixer shafts and any required instrumentation.
	Close any mixer vents when actual mixing is occurring, except that venting

Type of operation	Work practice standards
	is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a ninety-five per cent efficient control device are exempt from this requirement.
	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

* Containers of five gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of five hundred square inches or less may be open while active mixing is taking place.

d. The following HAP emissions limits from table 3 of subpart WWWW apply to this emissions unit:

Type of operation	Resin application method or gel coat type	HAP emissions limit*
Open molding: corrosion resistant and/or high strength (CR/HS)	Mechanical resin application	113 lb/ton
Open molding: non-CR/HS	Mechanical resin application	88 lb/ton
Open molding: tooling	Mechanical resin application	254 lb/ton
Open molding: low-flame spread/low-smoke products	Mechanical resin application	497 lb/ton
Open molding: shrinkage controlled resins**	Mechanical resin application	354 lb/ton

*Organic HAP emissions limits for open molding and centrifugal casting are expressed as pounds HAP per ton of resin or gel coat (pounds per ton). The operation shall be at or below these values on a twelve-month, rolling average.

e. Table 15 to subpart WWWW of 40 CFR Part 63 - "Applicability of General Provisions (subpart A) to subpart WWWW of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, subpart WWWW and subpart A.

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each month:

a. The total VOC emissions, in tons, from all resins and cleanup materials employed;

b. The total VOC emissions, in pounds, for each type of resin identified in Table 2 of OAC rule 3745-21-25;

c. The total quantity applied, in tons, for each type of resin identified in Table 2 of OAC rule 3745-21-25;

d. The actual monthly VOC emissions rate, in pounds of VOC per ton of resin applied, for each type of resin identified in Table 2 of OAC rule 3745-21-25; and

e. The rolling, 12-month VOC emissions rate, in pounds of VOC per ton of resin applied, for each type of resin identified in Table 2 of OAC rule 3745-21-25.

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

(2) The permittee shall maintain the records necessary to demonstrate compliance with the applicable work practice standards and VOC emissions limit(s) for OAC rule 3745-21-25 in accordance with OAC rules 3745-21-25(E), 3745-21-25(G), 3745-21-25(O) and 3745-21-25(P).

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

(3) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, subpart WWWW.

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

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit semi-annual compliance status reports in accordance with OAC rule 3745-21-25(Q).

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

(3) The permittee shall submit annual reports which specify the total VOC emissions from the use of resin and VOC-containing cleanup materials from this emissions unit for the previous year. These reports shall be submitted by April 15 of each year. For this reporting requirement, the permittee may provide the required information through the annual emission fee report, required pursuant to OAC rule 3745-78-02, provided that the emission data in the fee report is emissions unit specific.

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

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, subpart WWWW and subpart A.

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

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 limits established for each type of resin in table 2 of OAC rule 3745-21-25.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the applicable VOC emissions limitations from table 2 of OAC rule 3745-21-25 in accordance with OAC rule 3745-21-25(O), the recordkeeping required in d)(3)e, the monomeric styrene content for each resin and the following table[1]:

Process	**Styrene content in gelcoat, %**	**Pounds of styrene emitted per ton of gelcoat processed**
Mechanical Non-Atomized Application (vacuum bagging/closed mold curing without roll-out)	<33	(0.107 * %styrene) * 2000 * 0.55
	≥33	[(0.157 * %styrene) – 0.0165] * 2000 * 0.55

1 – The information presented in this table is derived from the American National Standards Institute's (ANSI) *"Estimating Emissions Factors from Open Molding and Other Composite Processes"*, October 13, 2009. As referenced in AP-42 Chapter 4.4, table 4.4-2, the most current version of the ANSI document should be used to estimate emissions from polyester resin plastic products fabrication operations. Subsequent revisions to the emissions factors in the ANSI document may require a permit modification.

b. Emission Limitation:

The permittee shall comply with the applicable work practice standards from table 1 of OAC rule 3745-21-25 for cleaning operations, materials storage operations, and mixing operations.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the applicable work practice standards from table 1 of OAC rule 3745-21-25 in accordance with OAC rule 3745-21-25(O).

c. Emission Limitation:

The permittee shall comply with the applicable work practice standards from table 4 of subpart WWWW for cleaning operations, materials storage operations, and mixing operations.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the applicable work practice standards from table 4 of subpart WWWW in accordance with 40 CFR Part 63.5900.

d. Emission Limitation:

The permittee shall comply with the applicable organic HAP emissions limitations from table 3 of subpart WWWW for open molding operations.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the applicable organic HAP emissions limitations from table 3 of subpart WWWW in accordance with 40 CFR Part 63.5900.

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

(2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, subpart WWWW and subpart A.

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

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group -Saw 1 & 2: P002,P003,

EU ID	Operations, Property and/or Equipment Description
P002	Panel cutting saw
P003	Panel cutting saw

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [PTI 01-7316]	Particulate emissions (PE) shall not exceed 0.05 grain per dry standard cubic foot. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B)(3).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)(3)	Particulate emissions (PE) shall not exceed 6.5 pounds per hour from emissions units P002, P003 and P004 combined. See b)(2)a. and below.

(2) Additional Terms and Conditions

a. The permittee demonstrated compliance with the combined PE limitation through performance tests conducted on June 28, 2007; therefore, it is not necessary to establish monitoring, recordkeeping, or reporting requirements to ensure compliance with this limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to eliminate the visible emissions.

[Authority for term: OAC rules 3745-17-11(B) and 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rules 3745-17-11(B) and 3745-77-07(C)(1)]

(3) The permittee shall also submit annual reports that specify the total particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for term: OAC rules 3745-17-11(B) and 3745-77-07(C)(1)]

(4) The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

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

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:

Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions shall not exceed 6.5 pounds per hour for emissions units P002, P003 and P004 combined.

Applicable Compliance Method:

The facility demonstrated compliance with the 6.5 pounds per hour particulate emissions limitation during performance tests conducted on June 28, 2007 (3.09 pounds per hour).

If required, the permittee shall demonstrate compliance with the applicable PE limitation identified in OAC rule 3745-17-11(B)(3), through emissions tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(10). Pursuant to OAC rule 3745-17-11(A)(3), if required, the performance test shall be conducted while emissions units P002, P003, and P004 are operating.

c. Emission Limitation:

Particulate emissions shall not exceed 0.05 grain per dry standard cubic foot.

Applicable Compliance Method:

Compliance with the grain loading limitation shall be determined in accordance with f)(2) below.

The facility demonstrated compliance with the 0.05 grain per dry standard cubic foot particulate emissions limitation during the most recent compliance tests conducted on December 14, 2006 (0.0256 grain per dry standard cubic foot).

[Authority for term: OAC rules 3745-15-04(A), 3745-17-07(A)(1), 3745-17-11(B)(1), 3745-77-07(C)(1) and PTI 01-7316]

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months prior to permit expiration;

b. The emission testing shall be conducted to demonstrate compliance with the allowable grain loading limitation (gr/dscf);

c. The following test method(s) shall be employed to demonstrate compliance with the allowable particulate mass emission limitations: Methods 1-5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA;

d. The test(s) shall be conducted while emissions units P002 and P003 are operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office;

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s);

f. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and

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

[Authority for term: OAC rules 3745-15-04(A), 3745-17-11(B)(1), 3745-77-07(C)(1) and PTI 01-7316]

g) Miscellaneous Requirements

(1) None.