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

7/14/2014

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Mr. George Frahn
Comfort Line Ltd.
5500 Enterprise Blvd
Toledo, OH 43216

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0448011664
Permit Number: P0116916
Permit Type: Administrative Modification
County: Lucas

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA)Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very 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 PTI 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, please contact Toledo Department of Environmental Services at (419)936-3015 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA
TDES; Michigan; Indiana; Canada

Response to Comments

Facility ID:	0448011664
Facility Name:	Comfort Line Ltd.
Facility Description:	Manufacture of extruded plastics
Facility Address:	5500 Enterprise Blvd Toledo, OH 43612 Lucas County
Permit:	P0116916, Permit-To-Install - Administrative Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Toledo Blade on 06/09/2014. The comment period ended on 07/09/2014.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

a. Comment: K001 and K002 are not exempt from the requirements of OAC rule 3745-17-11(C)(1) and (C)(2) and once U.S. EPA approves S.B. 265, the facility shall comply with these provisions.

b. Response: The terms and conditions for K001 and K002 have been revised to reflect the applicability of OAC rule 3745-17-11(C)(1) and (C)(2). The redlined version of the PSW and permit terms and conditions is attached in Stars2.

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Comfort Line Ltd.

Facility ID:	0448011664
Permit Number:	P0116916
Permit Type:	Administrative Modification
Issued:	7/14/2014
Effective:	7/14/2014

Division of Air Pollution Control
Permit-to-Install
for
Comfort Line Ltd.

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Authorization

Facility ID:	0448011664
Facility Description:	Manufacture of extruded plastics
Application Number(s):	A0050842
Permit Number:	P0116916
Permit Description:	Administrative modification to reduce maximum coating usage in K001, update BAT for K002 in accordance with the February 7, 2014 guidance, and make P014 de minimis.
Permit Type:	Administrative Modification
Permit Fee:	$100.00
Issue Date:	7/14/2014
Effective Date:	7/14/2014

This document constitutes issuance to:

Comfort Line Ltd.
5500 Enterprise Blvd
Toledo, OH 43612

of a Permit-to-Install for the emissions unit(s) identified on the following page.

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

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0116916
Permit Description: Administrative modification to reduce maximum coating usage in K001, update BAT for K002 in accordance with the February 7, 2014 guidance, and make P014 de minimis.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Group Name: spary coating operations

Emissions Unit ID:	**K001**
Company Equipment ID:	Topcoat Line 1 (former Main Paint Line)
Superseded Permit Number:	P0110554
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	Topcoat Line 2 (former Custom Paint Line)
Superseded Permit Number:	P0110554
General Permit Category andType:	Not Applicable

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.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) 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.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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 re-issuance, or modification.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. 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 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.

4. 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, 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.

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, 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.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Toledo Department of Environmental Services.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Toledo Department of Environmental Services. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted to the Toledo Department of Environmental Services every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. 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 are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to theToledo Department of Environmental Servicesin accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) 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 of an 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 appropriate Ohio EPA District Office or contracted

local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(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 Toledo Department of Environmental Services 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Toledo Department of Environmental Services.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Toledo Department of Environmental Services. 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.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s)not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the

Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit 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) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as “permanently shut down” in “Air Services” along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted,no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d)must be obtained beforeoperating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

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.

16. 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. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed.The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

19. 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.

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 combined emissions of Volatile Organic Compounds (VOC) from all emission units at this facility shall not exceed 90.00 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

   The combined emissions of VOC shall include the following emission units: K001, K002, P001, P002, P003, P004, P005, and P006.

3. The permittee shall collect and record the following information monthly for the purpose of determining compliance with the rolling, 12-month VOC emission limitation:

   a) for K001 and K002:

      (1) the company identification for each coating material employed;

      (2) the number of gallons of each coating, as employed;

      (3) the organic compound content of each coating, as employed, in pounds per gallon;

      (4) the total VOC emission rate for all coatings employed calculated as a summation of a)(2) x a)(3) for all coatings, in pounds per month;

   b) for P001:

      (1) the company identification of each resin employed;

      (2) the weight of each resin employed in pounds;

      (3) the VOC content of each resin employed (e.g., styrene), in percent by weight;

      (4) the total VOC emission rate for all resin employed calculated as the summation of b)(2) x b)(3) for all resins multiplied by the emissions factor of 0.01 pound VOC per pound of available VOC content (AP-42 Chapter 6.4, Table 6.4-1 dated 1/95), in pounds per month;

   c) for P002, P003, P004, P005 and P006:

      (1) the company identification of each resin employed;

      (2) the weight of each resin employed in pounds;

      (3) the VOC content of each resin employed (e.g., styrene), in percent by weight;

      (4) the total VOC emission rate for all resin employed calculated as the summation of c)(2) x c)(3) for all resins multiplied by the emissions factor of 0.04 pound VOC per pound of available VOC content (AP-42 Chapter 6.4, Table 6.4-1 dated 1/95), in pounds per month;

d) for all emissions units facility-wide:

(1) the company identification for each cleanup material employed;

(2) the volume of each cleanup material applied in gallons;

(3) the VOC content of each cleanup material applied in pounds per gallon;

(4) the total VOC emission rate for all clean-up materials employed calculated as a summation of d)(2) x d)(3) for all cleanup materials, in pounds per month;

e) the monthly VOC emissions rate from all emissions units, calculated as a summation of the total VOC emissions rates from all coatings, resins and clean-up materials recorded above divided by 2000 pounds per ton, in tons per month; and

f) the rolling, 12-month summation of the VOC emissions, calculated by adding the current month's VOC emissions from all emission units at this facility to the VOC emissions for the preceding eleven calendar months from all emission units at this facility, in tons.

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC. These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions, of this permit.

5. The following emission units contained in this permit are subject to 40 CFR Part 63, Subpart PPPP: K001 and K002. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District Office or local air agency.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -spary coating operations: K001, K002

EU ID	Operations, Property and/or Equipment Description
K001	Main coating line for fiberglass reinforced pultruded styrene resin with particulate control by a dry particulate filter system.
K002	Coating line for fiberglass reinforced pultruded styrene resin with particulate control by a dry particulate filter system.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	The emissions of volatile organic compound (VOC) from the coatings employed in this emissions unit shall not exceed 1.32 tons per month averaged over a 12-month rolling period. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The emissions from this emissions unit shall be vented to a dry fabric filter which will be maintained in accordance with OAC rule 3745-17-11(C)(1) and (C)(2) at all times the emissions unit is in operation. See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06	See b)(2)c.
d.	40 CFR Part 63 Subpart PPPP (40 CFR 63.4480 through 63.4581) [In accordance with 40 CFR 63.4481, this emissions unit is an existing surface coating operation at a major HAP source subject to the emissions limitations/control	Organic hazardous air pollutants(HAP) emissions from all coating operations onsite shall not exceed 0.16 pound per pound of coating solids applied during each 12-month compliance period. See b)(2)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	measures specified in this section.]	
e.	40 CFR Part 63, Subpart A (40 CFR 63.1 through 63.16	See b)(2)e.
f.	OAC rule 3745-17-07(A)(1)	Visible emissions (VE) from this emissions unit shall not exceed 20% opacity as a 6-minute average.
g.	OAC rule 3745-17-11(C)(1), (C)(2)	See b)(2)f.

(2) Additional Terms and Conditions

a. The annual VOC emission limitation reflects the potential to emit for this emissions unit at the company stated maximum rate of coating application rate (1 gallon per hour) and the maximum coating VOC content (3.63 pounds VOC per gallon coating). Therefore, it is not necessary to develop separate monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

c. The following terms and conditions apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminate source since the calculated annual emissions rate for PE is less that 10 tons per year taking into account the federally enforceable control requirements under OAC rule 3745-17-11(C).

d. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart PPPP.

The final rules found in 40 CFR Part 63, Subpart PPPP establish national emission standards for HAP, work practice standards, operating limitations, and

compliance requirements for plastic parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of plastic parts and products:

i. all coating operations as defined in 40 CFR 63.4581;

ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee shall be subject to the requirements and limitations of this NESHAP on December 5, 2007, at which time the initial compliance period begins for the coating operations; and the initial compliance period ends on December 30, 2008.

The permittee, using the "compliant material" option, shall not apply any coating in the coating operation(s) with an HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives, and cleaning/purge materials applied shall not contain HAP. If any individual coating applied does not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains organic HAP, the mass average HAP emission rate shall be calculated as required in 40 CFR 63.4551 and 63.4552 for the compliance period.

If the permittee chooses to use the "compliant coating option" for any coating or a group of coatings, in order to demonstrate compliance with this NESHAP, such coating operation(s) shall not apply any coating with an HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives, and cleaning/purge materials applied shall not contain HAP. If any individual material, used within a group of materials applied in the "compliant coating operation", exceeds the emission limitation for that coating group; or a thinner, additive, or cleaning/purge material containing an HAP is applied, the mass average HAP content for the coating operations must be calculated as required in this permit.

For any coating operation(s) that is meeting the emission limitations in 40 CFR 63.4490 by using the "without add-on control" option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month and on a rolling, 12-month basis following the initial compliance period, i.e., the mass average HAP emission rate shall be calculated each month as required in 40 CFR 63.4551 and 63.4552.

e. Table 2 to 40 CFR Part 63, Subpart PPPP shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.

f. The permittee shall control the particulate emissions (PE) from the coating operations of emissions unit with a dry particulate filtration system, or equivalent, and shall comply with the work practice requirements of OAC rule 3745-17-11(C)(2)(a) through (g).

c) Operational Restrictions

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

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

(3) See 40 CFR Part 63, Subpart PPPP (40 CFR 63.4480 – 63.4581).

d) Monitoring and/or Recordkeeping Requirements

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

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

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

(4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

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

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

(6) The permittee shall collect and record monthly the following information for the coating operation:

a. the company identification for each coating and reduction solvent;

b. the number of gallons of each coating employed, as applied;

c. the volatile organic compound content of each coating employed, in pounds per gallon as applied; and

d. the total volatile organic compound emission rate for all coatings, in pounds per month (b. x c.);

(7) See 40 CFR Part 63, Subpart PPPP (40 CFR 63.4480 – 63.4581).

e) Reporting Requirements

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

a. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;;

b. any exceedance of the maximum application rate of 1.0 gallon per hour or of the 3.63 pounds VOC per gallon coating maximum VOC content for any coating, and the amount of such exceedance; and

c. if no deviations, report no deviations.

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

(2) See 40 CFR Part 63, Subpart PPPP (40 CFR 63.4480 – 63.4581).

(3) 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.

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:

VE shall not exceed 20% opacity as a 6-minute average.

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:

0.16 pound of organic HAP emissions per pound of coating solids.

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods set forth in 40 CFR 63 Subpart PPPP under the "compliant coatings" (40 CFR 63.4542) or "emission rate without add-on controls" (40 CFR 63.4552), as appropriate.

c. Emission Limitation:

The emissions of volatile organic compound (VOC) from the coatings employed in this emissions unit shall not exceed 1.32 tons per month averaged over a 12-month rolling period.

Applicable Compliance Method:

The monthly emissions limitation averaged over a 12-month rolling period was established based on a one-time calculation of the worst case operating scenario, as follows: multiply the maximum rate of coating application rate (1 gallon per hour), by the maximum coating VOC content (3.63 pounds VOC per gallon coating) by the maximum annual hours of operation (8760 hours per year) and divide by 2000 pounds per ton and divide by 12 months per year.

g) Miscellaneous Requirements

(1) None.