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

9/26/2014

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. James Harrison
Composite Engineering LLC.
3204 Marshall Drive
Amelia, OH 45102

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1413000550
Permit Number: P0117305
Permit Type: Administrative Modification
County: Clermont

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 Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Erica R. Engel-Ishida, Interim Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
SWOAQA; Indiana; Kentucky

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Composite Engineering LLC.

Facility ID:	1413000550
Permit Number:	P0117305
Permit Type:	Administrative Modification
Issued:	9/26/2014
Effective:	9/26/2014

Division of Air Pollution Control
Permit-to-Install
for
Composite Engineering LLC.

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Authorization

Facility ID:	1413000550
Facility Description:	
Application Number(s):	M0002893
Permit Number:	P0117305
Permit Description:	Administrative Modification of PTI P0115283 to make BAT current with 2/7/14 guidance
Permit Type:	Administrative Modification
Permit Fee:	$0.00
Issue Date:	9/26/2014
Effective Date:	9/26/2014

This document constitutes issuance to:

Composite Engineering LLC.
3204 Marshall Drive
Amelia, OH 45102

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:

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

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: P0117305
Permit Description: Administrative Modification of PTI P0115283 to make BAT current with 2/7/14 guidance

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

Emissions Unit ID:	**P001**
Company Equipment ID:	P001
Superseded Permit Number:	P0115283
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	P002-Gel Coat
Superseded Permit Number:	P0115283
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P003**
Company Equipment ID:	P003-Hand Lay Up
Superseded Permit Number:	P0115283
General Permit Category and Type:	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 Southwest Ohio Air Quality Agency.

(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 Southwest Ohio Air Quality Agency. 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 Southwest Ohio Air Quality Agency 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 theSouthwest Ohio Air Quality Agencyin 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 Southwest Ohio Air Quality Agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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 Southwest Ohio Air Quality Agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (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 Southwest Ohio Air Quality Agency. 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 <u>obtained before</u>operating 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 following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants (NESHAP) Reinforced Plastic Composites Production: P001, P002, P003, and P004. The complete NESHAP requirements, including the NESHAP General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

3. The following abbreviations are used throughout this permit:

   HAP = Hazardous Air Pollutant

   OC = Organic Compounds

   VOC = Volatile Organic Compounds

   PE = Particulate matter measurable by the applicable test methods in 40 CFR Part 60, Appendix A, "Standards of Performance for New Stationary Sources"

   PM_{10} = Particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers as measured either by a reference method that is based on 40 CFR Part 50, Appendix J and designated in accordance with 40 CFR Part 53 or by an equivalent method designated in accordance with 40 CFR Part 53

   TPY = Tons per year

   PTI = Permit to Install

   CFR = Code of Federal Regulations

   OAC = Ohio Administrative Code

C. Emissions Unit Terms and Conditions

1. P001, Spray Up

Operations, Property and/or Equipment Description:

Fiberglass Spray Up Booth

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) as effective 11/30/01	For VOC emissions, the requirements of this rule are satisfied through compliance with the requirements of 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions. PE and PM10 emissions shall not exceed 0.2 ton PE/PM10 per month averaged over a 12-month rolling period. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3) as effective 12/01/06.	See b)(2)c.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1) Table I	PE shall not exceed 0.551 pound per hour. See b)(2)a.
e.	OAC rules 3745-21-25(A) through (S)	The requirements of this rule for the control of VOC emissions are equivalent to the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Compliance with the emission limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW will satisfy the requirements of this rule.
f.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 5935) [In accordance with 40 CFR 63.5790 and 63.5795, this emissions unit may include the following open molding operations: non-atomized resin application and filament application, material mixing, and HAP-containing materials storage associated with open molding at a new reinforced plastic composites production facility subject to the emission limits and work practice standards specified in this section.]	Table 3 to 40 CFR Part 63, Subpart WWWW - Organic Hazardous Air Pollutant (HAP) Emission Limits for Specific Open Molding, Centrifugal Casting, Pultrusion, and Continuous Lamination/Casting Operations shows which emission limits apply based upon the type of operation and the method of resin and gel coat application. See b)(2)e. for a listing of the specific emission limitations and c)(2) for compliance demonstration options. Table 4 to 40 CFR Part 63, Subpart WWWW- Applicable Work Practice Standards. See b)(2)f. and c)(1).
g.	40 CFR Part 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. The annual PE and PM10 emission limitation of 0.2 ton per month is based upon the federally enforceable rule limitation in Table I of OAC rule 3745-17-11 for PE of 0.551 pound PE per hour, assuming that all PE is PM10. The PE and PM10 emission rate of 0.551 pound per hour is greater than the potential to emit (PTE) of this emissions unit based upon the maximum material application rates, transfer efficiency, and control efficiency of the gel coat operation [see f)(1)b.]. Therefore, no hourly recordkeeping and/or reporting requirements are required to demonstrate compliance with this emission limit.

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality

Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, PM10 and VOC emissions from this air contaminant source since the uncontrolled potential to emit for PE, PM10 and VOC is less than 10 tons/year.

d. The permittee shall comply with the applicable work practice standards specified in Table 4 of 40 CFR Part 63, Subpart WWWW, including the following:

i. 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;

ii. 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;

iii. Keep the mixer covers closed while actual mixing is occurring, except when adding materials or changing covers to the mixing vessels;

iv. 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); and

v. 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.

e. The following organic HAP emission limitations shall not be exceeded, based on application technique and material properties, as specified in Table 3 of 40 CFR Part 63, Subpart WWWW:

If your operation type is . . .	And you use . . .	[1]Your organic HAP emissions limit is . . .
1. open molding—corrosion-resistant and/or high strength (CR/HS)	a. mechanical resin application b. filament application c. manual resin application	113 lb/ton. 171 lb/ton. 123 lb/ton.

2. open molding—non-CR/HS	a. mechanical resin application b. filament application c. manual resin application	88 lb/ton. 188 lb/ton 87 lb/ton.
3. open molding—tooling	a. mechanical resin application b. manual resin application	254 lb/ton. 157 lb/ton.
4. open molding—low-flame spread/low-smoke products	a. mechanical resin application b. filament application c. manual resin application	497 lb/ton 270 lb/ton. 238 lb/ton.
5. open molding—shrinkage controlled resins[2]	a. mechanical resin application b. filament application c. manual resin application	354 lb/ton. 215 lb/ton. 180 lb/ton.
6. open molding—gel coat[3]	a. tooling gel coating b. white/off white pigmented gel coating c. all other pigmented gel coating d. CR/HS or high performance gel coat e. fire retardant gel coat f. clear production gel coat	440 lb/ton. 267 lb/ton. 377 lb/ton. 605 lb/ton. 854 lb/ton. 522 lb/ton.

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

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

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

c) Operational Restrictions

(1) The permittee shall employ non-HAP containing cleanup solvent in this emissions unit.

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

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

	demonstration for one resin type and application method

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each month for the coating operation in this emissions unit:

a. the company identification for each coating (resin and gel coat) employed;

b. the amount of each coating (resin and gel coat) employed, in pounds;

c. the organic HAP content, recorded in percent weight, of each coating (resin and gel coat);

d. the organic HAP emissions in pounds per ton of resin or gel coat employed, calculated using the equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW; and

e. the rolling, 12-month average organic HAP emissions limit in pounds per ton of resin or gel coat employed, using the procedures outlined in 40 CFR 63.5810.

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

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

e) Reporting Requirements

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

a. any deviation from the prohibition of the use of HAP-containing cleanup solvent;

b. all exceedances of the organic HAP emission limitations in pounds per ton of resin or gel coat as specified in b)(2)e.; and

c. any deviation from the HAP-containing material storage requirements in b)(2)d.v.

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

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

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

The semi-annual reporting requirement may be satisfied by including and identifying the information in 63.5910(c) - (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

f) Testing Requirements

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

a. Emission Limitation:

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

Applicable Compliance Method:

Potential OC emissions were established based on information supplied by the permittee as follows:

0.02438 ton open-molding, non-atomized resin mechanical application rate/hour x 72.50 pounds OC/ton resin = 1.77 pounds OC/hour.

(1.77 pounds OC/hr x 8760 hr/year) / 2000 lb/ton = 7.75 tons OC/year.

b. Emission Limitations:

PE shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

The PE emission limitations represent the federally-enforceable rule limitation in Table I of OAC rule 3745-17-11(B) as follows:

For 0 < (P) < 0.05, (E) = 0.551,

where:

P = Process Weight Rate, tons/hour; for P001, P = 39.6 pounds/hour or 0.02 tons/hour, assuming all PE is PM_{10}; and

E = Emission rate, in pounds per hour.

Compliance with the hourly PE emission limitations is demonstrated by the following calculation representing the maximum potential PE emission rate of the emissions unit:

Maximum hourly coating usage of 39.6 pounds of coating/hour x maximum coating solids content of 0.01 pounds of solids/pound of coating x (1 – 0.45 TE) x (1 – 0.90 CE) = 0.02 pounds of solids, as maximum potential PE emissions per hour,

where:

TE = Transfer Efficiency of the sprayed resin containing the solids

CE = Control Efficiency for PM_{10}/PE of the dry filters.

c. Emission Limitation

PE and PM10 emissions shall not exceed 0.2 ton PE/PM10 per month averaged over a 12-month rolling period

Applicable Compliance Method

Allowable PE/PM10 emissions were determined assuming all PE is PM10 and based on the allowable 0.551 lb/hr per OAC rule 3745-17-11, as follows.

A x B / C / D = E

Where:

A = 0.551 pounds per hour by rule.

B = 8760 hours per year

C = 12 months

D = 2000 pounds per ton

E = Emission rate in tons per month

d. Emission Limitation:

Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

e. Emission Limitations:

Table 3 to 40 CFR Part 63, Subpart WWWW - Organic Hazardous Air Pollutant (HAP) Emission Limits for Specific Open Molding, Centrifugal Casting, Pultrusion, and Continuous Lamination/Casting Operations shows which emission limits apply based upon the type of operation and the method of resin and coating application (see b)(2)d.). [40 CFR 63.5805(b)]

Applicable Compliance Method:

Compliance with the organic HAP emission limitations found in 40 CFR Part 63, Subpart WWWW, shall be based upon the compliance demonstration utilized by the permittee as specified in c)(2) of this permit and the record keeping specified in 40 CFR Part 63.5780-5935 and d)(1) and d)(2) of this permit.

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

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

g) Miscellaneous Requirements

(1) None.

2. P002, Gel Coat

Operations, Property and/or Equipment Description:

Fiberglass Gel Coat Booth

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) ORC 3704.03(T)	For VOC emissions, the requirements of this rule are satisfied through compliance with the requirements of 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions.
b.	OAC rule 3745-31-05(A)(3) as effective 11/30/01.	PE and PM10 emissions shall not exceed 0.2 ton PE/PM10 per month averaged over a 12-month rolling period. See b)(2)a. and b)(2)b
c.	OAC rule 3745-31-05(A)(3) as effective 12/01/06.	See b)(2)c.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
e.	OAC rule 3745-17-11(B)(1) Table I	PE shall not exceed 0.551 pound per hour. See b)(2)a.
f.	OAC rules 3745-21-25(A) through (S)	The requirements of this rule for the control of VOC emissions are equivalent to the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions. Compliance with the emission limitations and control measures pursuant to 40

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		CFR Part 63, Subpart WWWW will satisfy the requirements of this rule.
g.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 5935) [In accordance with 40 CFR 63.5790 and 63.5795, this emissions unit may include the following open molding operations: non-atomized gel coat application, material mixing, and HAP-containing materials storage associated with open molding at a new reinforced plastic composites production facility subject to the emission limits and work practice standards specified in this section.]	Table 3 to 40 CFR Part 63, Subpart WWWW - Organic Hazardous Air Pollutant (HAP) Emission Limits for Specific Open Molding, Centrifugal Casting, Pultrusion, and Continuous Lamination/Casting Operations shows which emission limits apply based upon the type of operation and the method of resin and gel coat application. See b)(2)e. for a listing of the specific emission limitations and c)(2) for compliance demonstration options. Table 4 to 40 CFR Part 63, Subpart WWWW- Applicable Work Practice Standards. See b)(2)e. and c)(2).
h.	40 CFR Part 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. The annual PE and PM10 emission limitation of 0.2 ton per month is based upon the federally enforceable rule limitation in Table I of OAC rule 3745-17-11 for PE of 0.551 pound PE per hour, assuming that all PE is PM10. The PE and PM10 emission rate of 0.551 pound per hour is greater than the potential to emit (PTE) of this emissions unit based upon the maximum material application rates, transfer efficiency, and control efficiency of the gel coat operation [see f)(1)b.]. Therefore, no hourly recordkeeping and/or reporting requirements are required to demonstrate compliance with this emission limit.

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State

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

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE and PM10 emissions from this air contaminant source since the uncontrolled potential to emit for PE and PM10 is less than 10 tons/year.

d. The permittee shall comply with the applicable work practice standards specified in Table 4 of 40 CFR Part 63, Subpart WWWW, including the following:

i. 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;

ii. 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;

iii. Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels;

iv. 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); and

v. 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.

e. The following organic HAP emission limitations shall not be exceeded, based on application technique and material properties, as specified in Table 3 of 40 CFR Part 63, Subpart WWWW:

If your operation type is . . .	**And you use . . .**	**[1]Your organic HAP emissions limit is . . .**
1. open molding—corrosion-resistant and/or high strength (CR/HS)	a. mechanical resin application b. filament application c. manual resin application	113 lb/ton. 171 lb/ton. 123 lb/ton.
2. open molding—non-CR/HS	a. mechanical resin application b. filament application c. manual resin application	88 lb/ton. 188 lb/ton 87 lb/ton.
3. open molding—tooling	a. mechanical resin application	254 lb/ton.

	b. manual resin application	157 lb/ton.
4. open molding—low-flame spread/low-smoke products	a. mechanical resin application b. filament application c. manual resin application	497 lb/ton 270 lb/ton. 238 lb/ton.
5. open molding—shrinkage controlled resins[2]	a. mechanical resin application b. filament application c. manual resin application	354 lb/ton. 215 lb/ton. 180 lb/ton.
6. open molding—gel coat[3]	a. tooling gel coating b. white/off white pigmented gel coating c. all other pigmented gel coating d. CR/HS or high performance gel coat e. fire retardant gel coat f. clear production gel coat	440 lb/ton. 267 lb/ton. 377 lb/ton. 605 lb/ton. 854 lb/ton. 522 lb/ton.

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

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

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

c) Operational Restrictions

(1) The permittee shall employ non-HAP containing cleanup solvent in this emissions unit.

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

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each month for the coating operation in this emissions unit:

a. the company identification for each coating (resin and gel coat) employed;

b. the amount of each coating (resin and gel coat) employed, in pounds;

c. the organic HAP content, recorded in percent weight, of each coating (resin and gel coat);

d. the organic HAP emissions in pounds per ton of resin or gel coat employed, calculated using the equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW; and

e. the rolling, 12-month average organic HAP emissions limit in pounds per ton of resin or gel coat employed, using the procedures outlined in 40 CFR 63.5810.

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

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

e) Reporting Requirements

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

a. any deviation from the prohibition of the use of HAP-containing cleanup solvent;

b. all exceedances of the organic HAP emission limitations in pounds per ton of resin or gel coat as specified in b)(2)c.; and

c. any deviation from the HAP-containing material storage requirements in b)(2)b.v.

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

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

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

The semi-annual reporting requirement may be satisfied by including and identifying the information in 63.5910(c) - (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

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 Limitations:

PE shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

The PE emission limitations represent the federally-enforceable rule limitation in Table I of OAC rule 3745-17-11(B) as follows:

For $0 < (P) < 0.05$, $(E) = 0.551$,

where:

P = Process Weight Rate, tons/hour; for P002, P = 16.25 pounds/hour or 0.008 tons/hour; and

E = Emission rate, in pounds per hour.

Compliance with the hourly PE emission limitations is demonstrated by the following calculation representing the maximum potential PE emission rate of the emissions unit:

Maximum hourly coating usage of 16.25 pounds of coating/hour x maximum coating solids content of 0.26 pounds of solids/pound of coating x (1 – 0.45 TE) x

(1 – 0.90 CE) = 0.23 pounds of solids, as maximum potential PE emissions per hour,

where:

TE = Transfer Efficiency of the sprayed resin containing the solids

CE = Control Efficiency for PE of the dry filters

b. Emission Limitations:

PE and PM10 emissions shall not exceed 0.2 ton PE/PM10 per month averaged over a 12-month rolling period

Applicable Compliance Method:

Allowable PE/PM10 emissions were determined assuming all PE is PM10 and based on the allowable 0.551 lb/hr per OAC rule 3745-17-11, as follows.

A x B / C / D = E

Where:

A = 0.551 pounds per hour by rule.

B = 8760 hours per year

C = 12 months

D = 2000 pounds per ton

E = Emission rate in tons per month

c. Emission Limitation:

Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

d. Emission Limitations:

Table 3 to 40 CFR Part 63, Subpart WWWW - Organic Hazardous Air Pollutant (HAP) Emission Limits for Specific Open Molding, Centrifugal Casting, Pultrusion, and Continuous Lamination/Casting Operations shows which emission limits apply based upon the type of operation and the method of resin and coating application (see b)(2)c.). [40 CFR 63.5805(b)]

Applicable Compliance Method:

Compliance with the organic HAP emission limitations found in 40 CFR Part 63, Subpart WWWW, shall be based upon the compliance demonstration utilized by the permittee as specified in c)(2) of this permit and the record keeping specified in 40 CFR Part 63.5780-5935 and d)(1) and d)(2) of this permit.

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

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

g) Miscellaneous Requirements

(1) None.

3. P003, Hand Lay Up

Operations, Property and/or Equipment Description:

Fiberglass Hand Lay Up Area

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) ORC 3704.03(T)	For VOC emissions, the requirements of this rule are satisfied through compliance with the requirements of 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions.
b.	OAC rules 3745-21-25(A) through (S)	The requirements of this rule for the control of VOC emissions are equivalent to the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions. Compliance with the emission limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW will satisfy the requirements of this rule.
c.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 5935) [In accordance with 40 CFR 63.5790 and 63.5795, this emissions unit may include the following open molding operations: resin hand layup application, material mixing, and HAP-containing materials storage associated with open molding at a new reinforced plastic composites production facility subject to the emission limits and work practice standards specified in this section.]	Table 3 to 40 CFR Part 63, Subpart WWWW - Organic Hazardous Air Pollutant (HAP) Emission Limits for Specific Open Molding, Centrifugal Casting, Pultrusion, and Continuous Lamination/Casting Operations shows which emission limits apply based upon the type of operation and the method of resin and gel coat application. See b)(2)c. for a listing of the specific emission limitations and c)(2) for compliance demonstration options.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Table 4 to 40 CFR Part 63, Subpart WWWW- Applicable Work Practice Standards. See b)(2)c. and c)(1).
d.	40 CFR Part 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. The permittee shall comply with the applicable work practice standards specified in Table 4 of 40 CFR Part 63, Subpart WWWW, including the following:

i. 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;

ii. 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;

iii. Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels;

iv. 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); and

v. 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.

b. The following organic HAP emission limitations shall not be exceeded, based on application technique and material properties, as specified in Table 3 of 40 CFR Part 63, Subpart WWWW:

If your operation type is . . .	**And you use . . .**	**[1]Your organic HAP emissions limit is . . .**
1. open molding—corrosion-resistant and/or high strength (CR/HS)	a. mechanical resin application b. filament application c. manual resin application	113 lb/ton. 171 lb/ton. 123 lb/ton.

2. open molding—non-CR/HS	a. mechanical resin application b. filament application c. manual resin application	88 lb/ton. 188 lb/ton 87 lb/ton.
3. open molding—tooling	a. mechanical resin application b. manual resin application	254 lb/ton. 157 lb/ton.
4. open molding—low-flame spread/low-smoke products	a. mechanical resin application b. filament application c. manual resin application	497 lb/ton 270 lb/ton. 238 lb/ton.
5. open molding—shrinkage controlled resins[2]	a. mechanical resin application b. filament application c. manual resin application	354 lb/ton. 215 lb/ton. 180 lb/ton.
6. open molding—gel coat[3]	a. tooling gel coating b. white/off white pigmented gel coating c. all other pigmented gel coating d. CR/HS or high performance gel coat e. fire retardant gel coat f. clear production gel coat	440 lb/ton. 267 lb/ton. 377 lb/ton. 605 lb/ton. 854 lb/ton. 522 lb/ton.

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

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

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

c) Operational Restrictions

(1) The permittee shall employ non-HAP containing cleanup solvent in this emissions unit.

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

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

	method

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each month for the coating operation in this emissions unit:

a. the company identification for each coating (resin and gel coat) employed;

b. the amount of each coating (resin and gel coat) employed, in pounds;

c. the organic HAP content, recorded in percent weight, of each coating (resin and gel coat);

d. the organic HAP emissions in pounds per ton of resin or gel coat employed, calculated using the equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW; and

e. the rolling, 12-month average organic HAP emissions limit in pounds per ton of resin or gel coat employed, using the procedures outlined in 40 CFR 63.5810.

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

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

e) Reporting Requirements

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

a. any deviation from the prohibition of the use of HAP-containing cleanup solvent;

b. all exceedances of the organic HAP emission limitations in pounds per ton of resin or gel coat as specified in b)(2)c.; and

c. any deviation from the HAP-containing material storage requirements in b)(2)b.v.

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

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

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

The semi-annual reporting requirement may be satisfied by including and identifying the information in 63.5910(c) - (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

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 Limitations:

Table 3 to 40 CFR Part 63, Subpart WWWW - Organic Hazardous Air Pollutant (HAP) Emission Limits for Specific Open Molding, Centrifugal Casting, Pultrusion, and Continuous Lamination/Casting Operations shows which emission limits apply based upon the type of operation and the method of resin and coating application (see b)(2)b.). [40 CFR 63.5805(b)]

Applicable Compliance Method:

Compliance with the organic HAP emission limitations found in 40 CFR Part 63, Subpart WWWW, shall be based upon the compliance demonstration utilized by the permittee as specified in c)(2) of this permit and the record keeping specified in 40 CFR Part 63.5780-5935 and d)(1) and d)(2) of this permit.

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

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

g) Miscellaneous Requirements

(1) None.