



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

10/12/2016

Mr. Bryan Kern
 Style Crest Enterprises, Inc.
 600 Hagerty Dr.
 Fremont, OH 43420

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
 Facility ID: 0372030210
 Permit Number: P0121649
 Permit Type: Initial Installation
 County: Sandusky

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

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**
- **What should you do if you notice a spill or environmental emergency?**

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.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA
Ohio EPA-NWDO; Michigan; Canada



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Style Crest Enterprises, Inc.**

Facility ID:	0372030210
Permit Number:	P0121649
Permit Type:	Initial Installation
Issued:	10/12/2016
Effective:	10/12/2016



Division of Air Pollution Control
Permit-to-Install
for
Style Crest Enterprises, Inc.

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Final Permit-to-Install
Style Crest Enterprises, Inc.
Permit Number: P0121649
Facility ID: 0372030210
Effective Date: 10/12/2016

Authorization

Facility ID: 0372030210
Facility Description: Manufacturing of vinyl siding and fiberglass steps for mobile homes
Application Number(s): A0056810
Permit Number: P0121649
Permit Description: Initial installation for painting plastic molded parts
Permit Type: Initial Installation
Permit Fee: \$200.00
Issue Date: 10/12/2016
Effective Date: 10/12/2016

This document constitutes issuance to:

Style Crest Enterprises, Inc.
600 Hagerty Dr.
Fremont, OH 43420

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

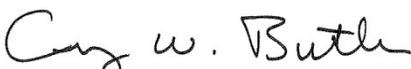
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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



Final Permit-to-Install
Style Crest Enterprises, Inc.
Permit Number: P0121649
Facility ID: 0372030210
Effective Date: 10/12/2016

Authorization (continued)

Permit Number: P0121649

Permit Description: Initial installation for painting plastic molded parts

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

Emissions Unit ID:	K002
Company Equipment ID:	Paint Process
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Style Crest Enterprises, Inc.
Permit Number: P0121649
Facility ID: 0372030210
Effective Date: 10/12/2016

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 Ohio EPA DAPC, Northwest District Office.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, 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 Ohio EPA DAPC, Northwest District Office. 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, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northwest District Office 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 the Ohio EPA DAPC, Northwest District Office in 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 Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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 Ohio EPA DAPC, Northwest District Office.
- 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 Ohio EPA DAPC, Northwest District Office. 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 before 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 entered upon 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.



Final Permit-to-Install
Style Crest Enterprises, Inc.
Permit Number: P0121649
Facility ID: 0372030210
Effective Date: 10/12/2016

B. Facility-Wide Terms and Conditions



Final Permit-to-Install
Style Crest Enterprises, Inc.
Permit Number: P0121649
Facility ID: 0372030210
Effective Date: 10/12/2016

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.



Final Permit-to-Install
Style Crest Enterprises, Inc.
Permit Number: P0121649
Facility ID: 0372030210
Effective Date: 10/12/2016

C. Emissions Unit Terms and Conditions

1. K002, Paint Process

Operations, Property and/or Equipment Description:

Brush and Roll on paint onto plastic molded parts.

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) June 30, 2008	Volatile Organic Compound (VOC) emissions shall not exceed 0.09 ton per month averaged over a 12-month rolling period. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the potential to emit for each is less than 10 tons/year. See b)(2)b.
c.	OAC rule 3745-21-07(M)	See b)(2)c.
d.	40 CFR, Part 63, Subpart PPPP [40 CFR 63.44.80-63.4581] In accordance with 40 CFR 63.4490(a)(1), this emissions unit is a new general use coating source subject to the emission limitations/control measures specified in this section.	The organic hazardous air pollutant (HAP) emissions from the new general use coatings operations shall not exceed: 0.16 lb/lb of coating solids used during each rolling, 12-month period. [40 CFR 63.4490(a)(1)] See b)(2)d. and b)(2)e.
e.	40 CFR 63.1-63.15 [40 CFR 63.4501]	Table 2 to Subpart PPPP of 40 CFR, Part 63 – Applicability of General Provisions to Subpart PPPP of Part 63- shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. This BAT requirement applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) [the less than 10 tons per year BAT exemption] into the Ohio State Implementation Plan (SIP).
- b. This requirement applies once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) [the less than 10 tons per year BAT exemption] into the Ohio SIP.
- c. This emissions unit is not subject to the requirements of this rule because it does not meet all of the conditions outlined in OAC rule 3745-21-07(M)(3)(a).
- 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 U.S. EPA 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 this NESHAP upon the startup of the coating operations. The first day of operations shall begin the initial compliance period, which shall end on the last day of the 12th month following the compliance date, or the last day of the 12th month following the month including the compliance date, if startup operations do not begin on the first day of the month.

- e. The permittee, using the “compliant material” option, shall not apply any coating in the coating operation(s) with an organic 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 organic 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 organic HAP emission rate shall be calculated as required in 40 CFR 63.4551 and 63.4552 for the compliance period.

c) Operational Restrictions

- (1) Every individual coating used in the “compliant coating operations” must meet the emission limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. Any coating operation meeting these limitations, for each material applied, shall not be required to meet the operating limits in 40 CFR 63.4492 or work practice standards in 40 CFR 63.4493.
- (2) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the operator/permittee reduce emissions to the greatest extent which is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.

The requirement to minimize emissions during any period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times, if it is not consistent with safety and good air pollution control practices; nor does it require the operator/permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. The operational and maintenance requirements contained in the NESHAP are enforceable, independent of the emissions limitations or other requirements of the rule.

Determination of whether such operation and maintenance procedures are being applied shall be based on information requested by and made available to the Director (appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency), which may include, but shall not be limited to: monitoring results, operation and maintenance procedures (including the startup, shutdown, and malfunction plan or other standard operating procedures), operation and maintenance records, and inspection of the facility.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all coatings employed in this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the VOC content, in pounds per gallon, of each coating employed; and
 - d. the VOC emission rate for each coating $[d)(2)b \times d)(2)c]$, in pounds;
 - e. the total VOC emission rate for all coatings $[\text{summation of } d)(2)d]$, in pounds or tons; and

- f. the monthly VOC emissions averaged over a rolling 12-month period, in tons, [the total VOC emissions for the present month plus the previous 11 months, in tons, divided by 12 months].
- (2) The permittee shall collect and record the following information each month for this emissions unit:
- a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the plastic parts coating operation(s), including at a minimum:
 - i. information from the supplier or manufacturer,
 - ii. formulation data and/or coating/material testing data,
 - iii. all data, documentation, and/or calculations needed to demonstrate that each coating meets the limits contained in 40 CFR 63.4490 and that each thinner, additive, and cleanup material applied in the plastic parts coating operations contained no organic HAP*;
 - b. the number of gallons of each coating, thinner/additive, and cleanup/purge material employed;
 - c. the density of each coating, thinner/additive, and cleanup/purge material employed, pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;
 - d. the mass fraction of organic HAP for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction, i.e., pound of HAP/pound of coating, using one of the following methods:
 - i. Method 311 from 40 CFR Part 63, Appendix A
 - ii. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for the mass fraction of HAP;
 - iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (pounds HAP/gallon of material ÷ pounds/gallon of material), or
 - iv. solvent blends listed as single components and where neither test data nor manufacturer's data is available, default values from Table 3 to Subpart PPPP or Table 4 if not listed in Table 3, can be used.
 - e. the mass fraction of coating solids (pound of coating solids/pound of coating) for each coating applied, determined using one of the following methods:
 - i. Method 24 from 40 CFR Part 60, Appendix A; or

- ii. information from the supplier or manufacturer of the coatings, where the mass fraction of coating solids can be calculated from the density and the mass of solids per gallon of each material (pound solids/gallon of coating ÷ pounds/gallon of coating);
- f. the organic HAP content of each coating, in pound of organic HAP emitted per pound of coating solids used, calculated as follows for each coating applied in the plastic parts coating operations using the “compliant material” option:

$$H_c = W_c / S_c$$

where:

H_c is the organic HAP content of coating “c”, in pound of organic HAP emitted per pound of coating solids used.

W_c is the mass fraction of organic HAP in coating “c”, pound of HAP per pound of coating, as determined in (d) above.

S_c is the mass fraction of coating solids in coating “c”, pound of coating solids per pound of coating, as determined in (e) above; and

- g. all calculations required by this permit for each rolling 12-month compliance period.

In order to demonstrate continuous compliance, the calculated organic HAP content (H_c) for each coating used must be less than or equal to the applicable emission limit in 40 CFR 63.4490; and each thinner and/or other additive, and cleaning material used during each compliance period (each month) must contain no organic HAP. These records shall constitute a separate initial compliance demonstration for each coating applied.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

* No organic HAP means no HAP at 1.0% or more by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass.

- (3) The permittee shall also maintain the following records for the plastic parts coating line:
 - a. a copy of each notification, report, and the supporting documentation used to demonstrate that each coating met the applicable limitation in 40 CFR 63.4490 or a record of each rolling 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP;
 - b. if using the predominant activity alternative under 40 CFR 63.4490(c)(1), the records of the data and calculations used to determine the predominant activity;
 - c. if using the “facility-specific” emission limit under 40 CFR 63.4490(c)(2), the data used to calculate the “facility-specific” emission limit; and

- d. the date, time, and duration of use, and the amount of any material applied in the compliant coating operations that did not meet the requirements of the “compliant material” option.

If demonstrating compliance with a predominant activity determination or a “facility-specific” emission limit, all coating operations included in the predominant activity determination or calculation of the “facility-specific” emissions limit must comply with the applicable limit and requirements for the “compliant material” option.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

- (4) The permittee shall maintain records to demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable limitation contained in this NESHAP and permit; and that no thinner, additive, and/or cleanup/purge material used in the coating operations contains organic HAP at 1.0% or more by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass. Each record shall be maintained for 5 years following the date of application of the coating.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. Any period of time VOC emissions exceed 0.09 ton per month averaged over a 12-month rolling period.

The quarterly deviation (excursion) reports shall be submitted in accordance with the 5reporting requirements of the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit an initial notification of compliance status report no later than 30 calendar days following the end of the initial compliance period (documented in the “Additional Terms and Conditions” section of this permit). The initial notification of compliance shall contain the following information:
 - a. company name and address;
 - b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official’s name, title, and signature);
 - c. the date of the report and beginning and ending dates of the reporting period;
 - d. identification of each coating operation using the “compliant material” option;

- e. a statement as to whether each coating met the emission limitation for the initial compliance period and if any thinner, additive, and/or cleanup material contained any organic HAP;
 - f. if there was a deviation during the initial compliance period, a description of the deviation and statement of the cause and the calculations of emissions used to determine noncompliance with the applicable limits;
 - g. calculations and/or supporting documentation (information from supplier or manufacturer or summary of testing results) for the following:
 - i. mass fraction of organic HAP for one representative coating, one thinner and/or additive, and one cleanup/purge material;
 - ii. the mass fraction of coating solids for the representative coating;
 - iii. the density for the representative coating; and
 - iv. the calculation of the organic HAP content for the representative coating, for demonstration of compliance with the limitation, in lb organic HAP per lb of coating solids;
 - h. if using the predominant activity alternative under 40 CFR 63.4490(c)(1), the data and calculations used to determine the predominant activity; and
 - i. if using the “facility-specific emission limit” alternative under 40 CFR 63.4490(c)(2), the calculation of the “facility-specific” emission limitation.
- (3) The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period. The reporting period is the 6-month period ending on June 30 and December 31 of each year. The semiannual compliance reports shall cover the previous 6 months of operation, and each monthly compliance calculation shall be based on the records from the previous (rolling) 12 months of operation. The semiannual report shall contain the following information:
- a. company name and address;
 - b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official’s name, title, and signature);
 - c. the date of the report and beginning and ending dates of the reporting period;
 - d. identification of the compliance method as either the “compliant material” option or the “without add-on control” option;
 - e. statement of whether the affected source achieved the emission limitations for the compliance period;

- f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period for the uncontrolled coating operations or the limitation from 40 CFR 63.4490 for each type of compliant coating applied;
 - g. if using the predominant activity alternative according to 40 CFR 63.4490(c)(1), the annual determination of predominant activity if it was not included in the previous semi-annual compliance report;
 - h. if using the “facility-specific emission limit” alternative according to 40 CFR 63.4490(c)(2), the calculation of the “facility-specific” emission limit for each 12-month compliance period during the 6-month reporting period;
 - i. if there were no deviations from the emission limitations in 63.4490, a statement that there were no deviations from the emissions limitations during the reporting period; and
 - j. if there were any deviations during the compliance period for the “compliant material” coating operations, the report shall include the following information:
 - i. an identification of each coating used that deviated from the applicable emission limit, and each thinner/additive, and cleaning material used that contained organic HAP and the dates and times each was used;
 - ii. the calculation of the organic HAP content for each coating that deviated from the applicable limit, lb organic HAP per gallon of coating solids;
 - iii. the determination of the mass fraction of organic HAP for each thinner, additive, and cleaning material used during the time of deviation; and
 - iv. a statement of the cause of each deviation.
- (4) The permittee shall identify in the semiannual reports any period of time where a coating was applied that exceeded the organic HAP content limitation contained in this NESHAP and/or a thinner, additive, and/or cleaning/purge material was applied that contained organic HAP as defined in this permit. The report shall document the date and duration of the exceedance, as well as the mass average organic HAP content calculation for the compliance period during which the exceedance occurred.
- f) **Testing Requirements**
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

VOC emissions shall not exceed 0.09 ton per month averaged over a 12-month rolling period.



Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the recordkeeping requirements in d)(1). Compliance with the ton per month averaged over a 12-month rolling period shall be determined following the first 12 months of operation.

b. Emission Limitation:

HAP emissions shall not exceed 0.16 lb/lb of coating solids used during each rolling, 12-month period.

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the recordkeeping requirements in d)(2).

g) Miscellaneous Requirements

(1) None.