



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

10/12/2016

Certified Mail

Robert Brennan
Core Composites Cincinnati, LLC
4174 Half Acre Rd
Batavia, OH 45103-4174

Facility ID: 1413020248
Permit Number: P0119666
County: Clermont

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Clermont Sun. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

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

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

A handwritten signature in cursive script that reads "Michael E. Hopkins".

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

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

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: HClerk@epa.ohio.gov

Draft Title V Permit Renewal

Core Composites Cincinnati, LLC

4174 Half Acre Road, , Batavia, OH 45103

ID#: P0119666

Date of Action: 10/12/2016

Permit Desc: Renewal of Title V Operating Permit for a manufacturer of custom fiberglass products, including multiple closed molding, open molding, and tooling operations..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Alberta Mellon, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777



Statement of Basis
 Core Composites Cincinnati, LLC
Permit Number: P0119666
Facility ID: 1413020248

Statement of Basis For Air Pollution Title V Permit

Facility ID:	1413020248
Facility Name:	Core Composites Cincinnati, LLC
Facility Description:	Manufacturer of custom fiberglass composite products.
Facility Address:	4174 Half Acre Road, Batavia, OH 45103
Permit #:	P0119666, Renewal
This facility is subject to Title V because it is major for: <input type="checkbox"/> Lead <input type="checkbox"/> Sulfur Dioxide <input type="checkbox"/> Carbon Monoxide <input type="checkbox"/> Volatile Organic Compounds <input type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> Particulate Matter < 10 microns <input checked="" type="checkbox"/> Single Hazardous Air Pollutant <input checked="" type="checkbox"/> Combined Hazardous Air Pollutants <input checked="" type="checkbox"/> Maximum Available Control Technology Standard(s) <input type="checkbox"/> GHG <input type="checkbox"/> Title IV	

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes. The insignificant emissions units (IEUs) that have applicable state and/or federally-enforceable requirements are included in the terms and conditions in Section B. All other IEUs at this facility are excluded from the requirements to obtain installation or operating permits pursuant to OAC rules 3745-15-05 and 3745-31-03 and have no applicable federally enforceable requirements; therefore, these IEUs are not included in the terms and conditions of this permit pursuant to OAC rule 3745-77-07(A)(13).
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit	N/A



document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	The permit renewal includes additional clarification of applicable federal rules in 40 CFR Part 63, Subpart WWWW, for existing affected sources, including closed molding, cleanup and mixing activities, which includes removal of state-only Air Toxics terms for affected sources under the MACT rules in accordance with Ohio EPA guidance since the federal rules address the pollutants (HAPs/organics) of concern through work practices/emission limitations.
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	N/A

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.2.	77-07(A)(13)	N	Listing of insignificant emissions units that are subject to SIP-approved and/or federal regulations.
B.3. – B.4.	N	40 CFR Part 63	Clarifying and reference terms for rule applicability determination regarding emissions units contained in the permit subject to National Emission Standards for Hazardous Air Pollutants (NESHAP).
B.5.	-21-25	N	Clarifying and reference term for rule applicability determination. Facility-wide VOC emissions less than 100 TPY, therefore exempt from additional VOC control requirements.

C. Emissions Unit Terms and Conditions

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



Statement of Basis
 Core Composites Cincinnati, LLC
Permit Number: P0119666
Facility ID: 1413020248

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P014	OC emissions shall not exceed 1.5 lbs/hr and 40 lbs/day from coatings (resins)	N	OAC 3745-31-05(A)(3)	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is determined by the permit monitoring and recordkeeping requirements documenting the hourly and daily coating usage and OC content of the coatings. All requirements for this EU have been transferred from the PTI.
P014 P036 P026 P029 P040 P041 P015 P016 P017 P002 P003 P004 P005 P033 P034 P006 P013 P035 P021 P032	OC emissions shall not exceed 19.8 lbs/day and 2.97 TPY from cleanup materials.	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restriction on daily and annual cleanup material usage and OC content of cleanup materials. ET: Compliance is determined by the permit monitoring and recordkeeping requirements documenting the cleanup material usage and OC content of the cleanup materials based upon Method 24 or formulation data. All requirements for these EUs have been transferred from the PTI.
P014 P027 P028 P015 P016 P017 P006 P013 P035 P021	OC emissions from coatings (resins and gel coats) employed in P006, P013-P017, P021, P027, P028, P032, and P035,	N	OAC 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain non-VOC restriction on cleanup materials. ET: Compliance is determined by the permit monitoring and recordkeeping requirements for these emissions units. All requirements for these EUs have been transferred from the PTI.



Statement of Basis
 Core Composites Cincinnati, LLC
Permit Number: P0119666
Facility ID: 1413020248

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P032	combined, shall not exceed 20 TPY as rolling 12-month summation.												
P014 P040 P041 P015 P016 P017 P002 P003 P004 P005 P033 P034 P006 P013 P035 P021 P032	Exempt	N	40 CFR Part 63, Subpart WWWW	Y	Y	Y	N	Y	Y	N	N	N	<p>ND: These emission units are RTM/closed molding operations exempt from the organic HAP emission standards in Subpart WWWW per 63.5790(c), however the cleaning, mixing, and material storage activities associated with these emissions units are subject to work practice standards in Table 4 of Subpart WWWW.</p> <p>OR: Permit terms include the operational/work practice requirements specified in the federal rule.</p>
P020 P025 P027 P028 P031 P026 P029 P018 P019	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day from coatings (gel coats/resins)	N	OAC 3745-31-05(A)(3)	N	N	Y	N	Y	Y	N	N	N	<p>ET: Compliance is determined by the permit monitoring and recordkeeping requirements documenting the hourly and daily coating usage and OC content of the coatings.</p> <p>All requirements for these EUs have been transferred from the PTI.</p>
P020 P018 P019	OC emissions shall not exceed 9.9 lbs/day and	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	<p>OR: Permit terms contain restriction on daily and annual cleanup material usage and OC content of cleanup materials.</p> <p>ET: Compliance is determined by the permit monitoring and</p>



Statement of Basis
 Core Composites Cincinnati, LLC
Permit Number: P0119666
Facility ID: 1413020248

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	1.8 TPY from cleanup materials.												recordkeeping requirements documenting the cleanup material usage and OC content of the cleanup materials based upon Method 24 or formulation data. All requirements for these EUs have been transferred from the PTI.
P020 P018 P019	PE/PM ₁₀ emissions shall not exceed 0.81 lb/hour and 4.1 lbs/day.	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain particulate dry filtration system requirements. ET: Compliance is determined by the permit monitoring and recordkeeping requirements documenting the hourly and daily coating usage and spray application transfer efficiency. All requirements for these EUs have been transferred from the PTI.
P020 P018 P019	OC emissions from coatings (resins and gel coats) employed in P018, P019, and P020, combined, shall not exceed 15 TPY as rolling 12-month summation.	N	OAC 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain non-VOC restriction on cleanup materials. ET: Compliance is determined by the permit monitoring and recordkeeping requirements for these emissions units. All requirements for these EUs have been transferred from the PTI.
P020 P018 P019	PE/PM ₁₀ emissions shall not exceed 0.51 TPY as rolling 12-month summation.	N	OAC 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain particulate dry filtration system requirements. ET: Compliance is determined by the permit monitoring and recordkeeping requirements for these emissions units, including the dry filtration design control efficiency and spray transfer efficiency of the coating process.



Statement of Basis
 Core Composites Cincinnati, LLC
Permit Number: P0119666
Facility ID: 1413020248

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
													All requirements for these EUs have been transferred from the PTI.
P020 P022 P025 P027 P028 P030 P031 P037 P038 P026 P029 P018 P019 P023 P024 R001 R002 R003 R004	20% opacity, as 6 min avg	17-07(A)	N	N	N	Y	N	Y	Y	N	N	N	ET: M, R, Rp terms require particulate control (dry filtration system) inspections as indicator of compliance or potential noncompliance with the visible emission opacity limitation. If the records and reports from the inspections indicate potential noncompliance, then testing would be required under OAC rule 3745-15-04(A) to demonstrate compliance with the opacity limitations in accordance with Method 9 procedures.
P020 P022 P025 P027 P028 P030 P031 P037 P038 P026 P029 P018 P019 P023 P024 R001	Exempt	17-11(C)	N	Y	N	N	N	N	N	N	N	N	ND: The underlying PTIs for these emissions units contain more stringent PE/PM ₁₀ emission limitations under BAT that supersede the PE emission limitations established in OAC rule 3745-17-11(C) for spray coating processes.



Statement of Basis
 Core Composites Cincinnati, LLC
Permit Number: P0119666
Facility ID: 1413020248

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
R002 R003 R004													
P020 P022 P025 P027 P028 P030 P031 P036 P037 P038 P039 P026 P029 P018 P019 P023 P024	Table 3 to 40 CFR Part 63, Subpart WWWW - Organic HAP Emission Limits	N	40 CFR Part 63, Subpart WWWW	N	Y	Y	N	Y	Y	N	N	N	OR: These EUs are open molding operations required to comply with work practice requirements in Table 4 and utilize compliance demonstration options pursuant to Subpart WWWW 63.5810 which depend on the resins and gel coats employed and the method(s) of application as specified in the permit terms. Applicable monitoring, record keeping and reporting requirements from Subpart WWWW will determine compliance. ET: Compliance with emission limitations determined by monitoring and record keeping requirements pursuant to Subpart WWWW.
P022	OC emissions shall not exceed 10 lbs/hr and 157 lbs/day from coatings (gel coats)	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restriction on hourly and daily coating usage and OC content. ET: Compliance is determined by the permit monitoring and recordkeeping requirements documenting the hourly and daily coating usage and OC content of the coatings. All requirements for this EU have been transferred from the PTI.
P022 P023 P024	OC emissions shall not exceed 13.2 lbs/day and 1.16 TPY from cleanup materials.	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restriction on daily and annual cleanup material usage and OC content of cleanup materials. ET: Compliance is determined by the permit monitoring and recordkeeping requirements documenting the cleanup material usage and OC content of the cleanup materials based upon Method 24 or formulation data.



Statement of Basis
 Core Composites Cincinnati, LLC
Permit Number: P0119666
Facility ID: 1413020248

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
													All requirements for these EUs have been transferred from the PTI.
P022 P030	PE/PM ₁₀ emissions shall not exceed 0.39 lb/hour, 6.07 lbs/day, and 0.60 TPY.	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restriction on hourly and daily coating usage, particulate dry filtration system requirements, and use of robotic spray application system. ET: Compliance is determined by the permit monitoring and recordkeeping requirements documenting the hourly and daily coating usage and spray application transfer efficiency. All requirements for these EUs have been transferred from the PTI.
P022 P030	OC emissions from coatings (gel coats) employed shall not exceed 15.5 TPY as rolling 12-month summation.	N	OAC 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restriction on coating usage and non-VOC restriction on cleanup materials. ET: Compliance is determined by the permit monitoring and recordkeeping requirements for these emissions units. All requirements for these EUs have been transferred from the PTI.
P025 P027 P028 P031 P037 P038 P039	OC emissions shall not exceed 3.3 lbs/day and 0.495 TPY from cleanup materials.	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restriction on daily and annual cleanup material usage and OC content of cleanup materials. ET: Compliance is determined by the permit monitoring and recordkeeping requirements documenting the cleanup material usage and OC content of the cleanup materials based upon Method 24 or formulation data. All requirements for these EUs have been transferred from the PTI.
P025 P027 P028 P031	PE/PM ₁₀ emissions shall not exceed 0.28	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain particulate dry filtration system requirements. ET: Compliance is determined by the permit monitoring and



Statement of Basis
 Core Composites Cincinnati, LLC
Permit Number: P0119666
Facility ID: 1413020248

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	lb/hour and 1.38 lbs/day.												recordkeeping requirements documenting the hourly and daily coating usage and spray application transfer efficiency. All requirements for these EUs have been transferred from the PTI.
P025	PE/PM ₁₀ emissions shall not exceed 0.18 TPY as rolling 12-month summation.	N	OAC 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain particulate dry filtration system requirements. ET: Compliance is determined by the permit monitoring and recordkeeping requirements for these emissions units, including the dry filtration design control efficiency and spray transfer efficiency of the coating process. All requirements for this EU have been transferred from the PTI.
P025	OC emissions from coatings (gel coats) employed shall not exceed 7 TPY as rolling 12-month summation.	N	OAC 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain non-VOC restriction on cleanup materials. ET: Compliance is determined by the permit monitoring and recordkeeping requirements for this emissions unit. All requirements for this EU have been transferred from the PTI.
P027	PE/PM ₁₀ emissions shall not exceed 0.24 TPY as rolling 12-month summation.	N	OAC 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain particulate dry filtration system requirements. ET: Compliance is determined by the permit monitoring and recordkeeping requirements for these emissions units, including the dry filtration design control efficiency and spray transfer efficiency of the coating process. All requirements for this EU have been transferred from the PTI.
P028	PE/PM ₁₀	N	OAC 3745-31-	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain particulate dry filtration system



Statement of Basis
 Core Composites Cincinnati, LLC
Permit Number: P0119666
Facility ID: 1413020248

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P031	emissions shall not exceed 0.06 TPY as rolling 12-month summation.		05(D)										requirements. ET: Compliance is determined by the permit monitoring and recordkeeping requirements for these emissions units, including the dry filtration design control efficiency and spray transfer efficiency of the coating process. All requirements for these EUs have been transferred from the PTI.
P030	OC emissions shall not exceed 10.1 lbs/hr and 157 lbs/day from coatings (gel coats)	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restriction on hourly and daily coating usage and OC content. ET: Compliance is determined by the permit monitoring and recordkeeping requirements documenting the hourly and daily coating usage and OC content of the coatings. All requirements for this EU have been transferred from the PTI.
P030	OC emissions shall not exceed 13.2 lbs/day and 2.4 TPY from cleanup materials.	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restriction on daily and annual cleanup material usage and OC content of cleanup materials. ET: Compliance is determined by the permit monitoring and recordkeeping requirements documenting the cleanup material usage and OC content of the cleanup materials based upon Method 24 or formulation data. All requirements for this EU have been transferred from the PTI.
P030 P031 P002 P003 P004 P005 P033 P034	OC emissions from coatings (resins and gel coats) employed in P002-P005, P030, P031, P033, and	N	OAC 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain non-VOC restriction on cleanup materials. ET: Compliance is determined by the permit monitoring and recordkeeping requirements for these emissions units. All requirements for these EUs have been transferred from the PTI.



Statement of Basis
 Core Composites Cincinnati, LLC
Permit Number: P0119666
Facility ID: 1413020248

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	P034, combined, shall not exceed 25 TPY as rolling 12-month summation.												
P036	OC emissions shall not exceed 1.0 lbs/hr and 40 lbs/day from coatings (resins)	N	OAC 3745-31-05(A)(3)	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is determined by the permit monitoring and recordkeeping requirements documenting the hourly and daily coating usage and OC content of the coatings. All requirements for this EU have been transferred from the PTI.
P036	OC emissions from coatings (resins) employed shall not exceed 1.0 TPY as rolling 12-month summation.	N	OAC 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain non-VOC restriction on cleanup materials. ET: Compliance is determined by the permit monitoring and recordkeeping requirements for this emissions unit. All requirements for this EU have been transferred from the PTI.
P037	OC emissions shall not exceed 2.0 lbs/hr and 40 lbs/day from coatings (gel coats)	N	OAC 3745-31-05(A)(3)	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is determined by the permit monitoring and recordkeeping requirements documenting the hourly and daily coating usage and OC content of the coatings. All requirements for this EU have been transferred from the PTI.
P037	PE/PM ₁₀ emissions shall not exceed 0.27 lb/hour and	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain particulate dry filtration system requirements. ET: Compliance is determined by the permit monitoring and recordkeeping requirements documenting the hourly and daily



Statement of Basis
 Core Composites Cincinnati, LLC
Permit Number: P0119666
Facility ID: 1413020248

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	1.38 lbs/day.												coating usage and spray application transfer efficiency. All requirements for this EU have been transferred from the PTI.
P037	PE/PM ₁₀ emissions shall not exceed 0.01 TPY as rolling 12-month summation.	N	OAC 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain particulate dry filtration system requirements. ET: Compliance is determined by the permit monitoring and recordkeeping requirements for these emissions units, including the dry filtration design control efficiency and spray transfer efficiency of the coating process. All requirements for this EU have been transferred from the PTI.
P037	OC emissions from coatings (gel coats) employed shall not exceed 0.3 TPY as rolling 12-month summation.	N	OAC 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain non-VOC restriction on cleanup materials. ET: Compliance is determined by the permit monitoring and recordkeeping requirements for this emissions unit. All requirements for this EU have been transferred from the PTI.
P038 P039	OC emissions shall not exceed 2.0 lbs/hr and 40 lbs/day from coatings (resins)	N	OAC 3745-31-05(A)(3)	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is determined by the permit monitoring and recordkeeping requirements documenting the hourly and daily coating usage and OC content of the coatings. All requirements for these EUs have been transferred from the PTI.
P038	PE/PM ₁₀ emissions shall not exceed 0.814 lb/hour and	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain particulate dry filtration system requirements. ET: Compliance is determined by the permit monitoring and recordkeeping requirements documenting the hourly and daily



Statement of Basis
 Core Composites Cincinnati, LLC
Permit Number: P0119666
Facility ID: 1413020248

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	4.07 lbs/day.												coating usage and spray application transfer efficiency. All requirements for this EU have been transferred from the PTI.
P038	OC emissions from coatings (resins) employed shall not exceed 0.5 TPY as rolling 12-month summation.	N	OAC 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain non-VOC restriction on cleanup materials. ET: Compliance is determined by the permit monitoring and recordkeeping requirements for this emissions unit. All requirements for this EU have been transferred from the PTI.
P038	PE/PM ₁₀ emissions shall not exceed 0.05 TPY as rolling 12-month summation.	N	OAC 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain particulate dry filtration system requirements. ET: Compliance is determined by the permit monitoring and recordkeeping requirements for these emissions units, including the dry filtration design control efficiency and spray transfer efficiency of the coating process. All requirements for this EU have been transferred from the PTI.
P039	OC emissions from coatings (resins) employed shall not exceed 0.2 TPY as rolling 12-month summation.	N	OAC 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain non-VOC restriction on cleanup materials. ET: Compliance is determined by the permit monitoring and recordkeeping requirements for this emissions unit. All requirements for this EU have been transferred from the PTI.
P026 P029	PE/PM ₁₀ emissions	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain particulate dry filtration system requirements.



Statement of Basis
 Core Composites Cincinnati, LLC
Permit Number: P0119666
Facility ID: 1413020248

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	shall not exceed 0.28 lb/hour and 1.38 lbs/day.												ET: Compliance is determined by the permit monitoring and recordkeeping requirements documenting the hourly and daily coating usage and spray application transfer efficiency. All requirements for these EUs have been transferred from the PTI.
P026 P029 P040 P041	OC emissions from coatings (resins and gel coats) employed in P026, P029, P040, and P041, combined, shall not exceed 28 TPY as rolling 12-month summation.	N	OAC 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain non-VOC restriction on cleanup materials. ET: Compliance is determined by the permit monitoring and recordkeeping requirements for these emissions units. All requirements for these EUs have been transferred from the PTI.
P026 P029	PE/PM ₁₀ emissions shall not exceed 0.24 TPY as rolling 12-month summation.	N	OAC 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain particulate dry filtration system requirements. ET: Compliance is determined by the permit monitoring and recordkeeping requirements for these emissions units, including the dry filtration design control efficiency and spray transfer efficiency of the coating process. All requirements for these EUs have been transferred from the PTI.
P023 P024	OC emissions shall not exceed 18.5 lbs/hr and 208 lbs/day	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restriction on hourly and daily coating usage and OC content. ET: Compliance is determined by the permit monitoring and recordkeeping requirements documenting the hourly and daily



Statement of Basis
 Core Composites Cincinnati, LLC
Permit Number: P0119666
Facility ID: 1413020248

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	from coatings (resins)												coating usage and OC content of the coatings. All requirements for these EUs have been transferred from the PTI.
P023 P024	PE/PM ₁₀ emissions shall not exceed 2.05 lb/hour, 22.9 lbs/day, and 2.77 TPY.	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restriction on hourly and daily coating usage, particulate dry filtration system requirements, and use of robotic spray application system. ET: Compliance is determined by the permit monitoring and recordkeeping requirements documenting the hourly and daily coating usage and spray application transfer efficiency. All requirements for these EUs have been transferred from the PTI.
P023 P024	OC emissions from coatings (resins) employed shall not exceed 25 TPY as rolling 12-month summation.	N	OAC 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restriction on coating usage and non-VOC restriction on cleanup materials. ET: Compliance is determined by the permit monitoring and recordkeeping requirements for these emissions units. All requirements for these EUs have been transferred from the PTI.
R001 R002 R003 R004	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day from all coatings.	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restriction on hourly and daily coating usage and OC content. ET: Compliance is determined by the permit monitoring and recordkeeping requirements documenting the hourly and daily coating usage and OC content of the coatings. All requirements for these EUs have been transferred from the PTI.
R001 R002 R003	OC emissions shall not exceed 7.0	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restriction on daily cleanup material usage and OC content of cleanup materials.



Statement of Basis
 Core Composites Cincinnati, LLC
Permit Number: P0119666
Facility ID: 1413020248

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
R004	lbs/day from cleanup materials.												ET: Compliance is determined by the permit monitoring and recordkeeping requirements documenting the cleanup material usage and OC content of the cleanup materials based upon Method 24 or formulation data. All requirements for these EUs have been transferred from the PTI.
R001 R002 R003 R004	PE/PM ₁₀ emissions shall not exceed 0.17 lb/hour and 0.73 TPY.	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restriction for particulate dry filtration system requirements. ET: Compliance is determined by the permit monitoring and recordkeeping requirements for the dry filtration system to assure the design control efficiency, the maximum hourly coating application rate, and the spray application transfer efficiency. The hourly emission rate reflects the potential to emit based upon the above factors. The annual emission rate was calculated based upon 8,760 hours of operation per year. All requirements for these EUs have been transferred from the PTI.
R001 R002	OC emissions from all coatings and cleanup materials employed shall not exceed 5 TPY as rolling 12-month summation.	N	OAC 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restriction on coating usage, cleanup usage, and non-VOC restriction on cleanup materials. ET: Compliance is determined by the permit monitoring and recordkeeping requirements for these emissions units. All requirements for these EUs have been transferred from the PTI.
R003 R004	OC emissions from all coatings and cleanup	N	OAC 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restriction on coating usage, cleanup usage, and non-VOC restriction on cleanup materials. ET: Compliance is determined by the permit monitoring and



Statement of Basis
 Core Composites Cincinnati, LLC
Permit Number: P0119666
Facility ID: 1413020248

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	materials employed shall not exceed 7.75 TPY as rolling 12-month summation.												recordkeeping requirements for these emissions units. All requirements for these EUs have been transferred from the PTI.
P040 P041 P002 P003 P004 P006 P013 P035	OC emissions shall not exceed 5.0 lbs/hr and 40 lbs/day from coatings (resins)	N	OAC 3745-31-05(A)(3)	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is determined by the permit monitoring and recordkeeping requirements documenting the hourly and daily coating usage and OC content of the coatings. All requirements for these EUs have been transferred from the PTI.
P015 P016 P017	OC emissions shall not exceed 2.0 lbs/hr and 40 lbs/day from coatings (resins)	N	OAC 3745-31-05(A)(3)	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is determined by the permit monitoring and recordkeeping requirements documenting the hourly and daily coating usage and OC content of the coatings. All requirements for these EUs have been transferred from the PTI.
P005 P033 P034 P021 P032	OC emissions shall not exceed 3 lbs/hr and 40 lbs/day from coatings (resins)	N	OAC 3745-31-05(A)(3)	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is determined by the permit monitoring and recordkeeping requirements documenting the hourly and daily coating usage and OC content of the coatings. All requirements for these EUs have been transferred from the PTI.



DRAFT

**Division of Air Pollution Control
Title V Permit
for
Core Composites Cincinnati, LLC**

Facility ID:	1413020248
Permit Number:	P0119666
Permit Type:	Renewal
Issued:	10/12/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Core Composites Cincinnati, LLC

Table of Contents

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



29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	15
30. Submitting Documents Required by this Permit	16
B. Facility-Wide Terms and Conditions.....	17
C. Emissions Unit Terms and Conditions	20
1. P014, RTM Pump 3 Bldg A	21
2. P020, Main Spray Booth Gel Coat	29
3. P022, Robot (Venus) Gel Coat Booth	43
4. P025, Main Spray Booth Gel Coat - 2	57
5. P027, Service Gel Coat Main Bldg - 2.....	70
6. P028, Service Gel Coat Main Bldg - 3.....	84
7. P030, Service Gel Coat Bldg B - 1	97
8. P031, Service Gel Coat Bldg B - 2	111
9. P036, Hand Layup Area.....	125
10. P037, Tooling Gel Coat.....	135
11. P038, Tooling Spray Chop	148
12. P039, Tooling Layup	161
13. Emissions Unit Group - Gel Coat: P026, P029	171
14. Emissions Unit Group - Open Molding, Manual: P018, P019	184
15. Emissions Unit Group - Open Molding, Mechanical: P023, P024	197
16. Emissions Unit Group - Primer Booths, Group 1: R001, R002	211
17. Emissions Unit Group - Primer Booths, Group 2: R003, R004	219
18. Emissions Unit Group - RTM Units, Group 1: P040, P041.....	227
19. Emissions Unit Group - RTM Units, Group 2: P015, P016, P017	235
20. Emissions Unit Group - RTM Units, Group 3: P002, P003, P004	243
21. Emissions Unit Group - RTM Units, Group 4: P005, P033, P034	251
22. Emissions Unit Group - RTM Units, Group 5: P006, P013, P035	259
23. Emissions Unit Group - RTM Units, Group 6: P021, P032.....	267



Draft Title V Permit
Core Composites Cincinnati, LLC
Permit Number: P0119666
Facility ID: 1413020248
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1413020248
Facility Description: Manufacturer of custom fiber glass products.
Application Number(s): A0053064, A0055920
Permit Number: P0119666
Permit Description: Renewal of Title V Operating Permit for a manufacturer of custom fiberglass products, including multiple closed molding, open molding, and tooling operations.
Permit Type: Renewal
Issue Date: 10/12/2016
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0104748

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

Core Composites Cincinnati, LLC
4174 Half Acre Road
Batavia, OH 45103

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Title V Permit
Core Composites Cincinnati, LLC
Permit Number: P0119666
Facility ID: 1413020248
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))



c) The permittee shall submit required reports in the following manner:

- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

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

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Southwest Ohio Air Quality Agency. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

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

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Southwest Ohio Air Quality Agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable

requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

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

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

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

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

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

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.

- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Southwest Ohio Air Quality Agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Southwest Ohio Air Quality Agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms



and conditions with which there has been continuous compliance throughout the year are not separately identified.

- b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Southwest Ohio Air Quality Agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Southwest Ohio Air Quality Agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

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

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

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

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:



- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Southwest Ohio Air Quality Agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention Requirements Under State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine

whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Southwest Ohio Air Quality Agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Southwest Ohio Air Quality Agency must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



Draft Title V Permit
Core Composites Cincinnati, LLC
Permit Number: P0119666
Facility ID: 1413020248

Effective Date: To be entered upon final issuance

30. Submitting Documents Required by this Permit

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



Draft Title V Permit
Core Composites Cincinnati, LLC
Permit Number: P0119666
Facility ID: 1413020248
Effective Date: To be entered upon final issuance

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 insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, and/or 40 CFR Part 60 or 63:

B001 Durken 320,000 Btu/hr natural gas boiler

B002 McLain 1,053,000 Btu/hr natural gas boiler

B003 Thermo Pak 852,000 Btu/hr natural gas boiler [PTI 18-138, issued 11/30/1981]

T001 Resin/gel coat mixing tank

[Authority for term: OAC rule 3745-77-07(A)(13)]

3. The following insignificant emissions units listed above are subject to 40 CFR Part 63, Subparts A and DDDDD, National Emission Standards for Hazardous Air Pollutants (NESHAP) Industrial, Commercial, and Institutional Boilers and Process Heaters: B001, B002, and B003. The complete NESHAP requirements, including the NESHAP General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

[Authority for term: 40 CFR Part 63]

4. The following emissions units and insignificant emissions unit contained in this permit are subject to 40 CFR Part 63, Subparts A and WWW, National Emission Standards for Hazardous Air Pollutants (NESHAP) Reinforced Plastic Composites Production: P002, P003, P004, P005, P006, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, P037, P038, P039, P040, P041, and T001. The complete NESHAP requirements, including the NESHAP General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

[Authority for term: 40 CFR Part 63]

5. The permittee has demonstrated that actual facility-wide VOC emissions from all reinforced plastic composite operations are less than the one hundred tons of VOC per year emissions threshold that would require VOC control pursuant to OAC rule 3745-21-25(D)(3). In accordance with OAC rule 3745-21-25(D)(5), once the facility exceeds the one hundred tons of VOC per year emissions threshold as calculated according to OAC rule 3745-21-25(F)(5), the facility shall be subject to paragraph (D)(3) of OAC rule 3745-21-25 and shall report this exceedance to the Southwest Ohio Air Quality Agency.

[Authority for term: OAC rule 3745-21-25]



6. The following abbreviations are used throughout this permit:

RTM = Resin transfer molding (closed molding), as defined in 40 CFR 63.5935

OC = Organic compounds

VOC = Volatile organic compounds, as defined in OAC rule 3745-21-01

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

PM₁₀ = 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

HAP = Hazardous air pollutant

TPY = Ton(s) per year

Btu = British thermal units

PTI = Permit to Install

CFR = Code of Federal Regulations

OAC = Ohio Administrative Code



Draft Title V Permit
Core Composites Cincinnati, LLC
Permit Number: P0119666
Facility ID: 1413020248
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P014, RTM Pump 3 Bldg A

Operations, Property and/or Equipment Description:

RTM Pump 3 Main Bldg

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05196, issued 7/9/2002)	OC emissions shall not exceed 1.5 pounds per hour and 40 pounds per day from coatings (resins). OC emissions shall not exceed 19.8 pounds per day from cleanup materials. OC emissions shall not exceed 2.97 TPY from cleanup materials. See c)(1) and c)(2). Compliance with this rule also includes compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (PTI 14-05196, issued 7/9/2002) Synthetic Minor to Avoid Major New Source Review	See b)(2)a. and c)(3).
c.	OAC rule 3745-21-25	The requirements of this rule for the control of VOC emissions are equivalent to, or less stringent than, the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions and the requirements established pursuant to OAC rule 3745-31-05 for OC/VOC emissions. Compliance with the emission



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-31-05 will satisfy the requirements of this rule.
d.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 5935)</p> <p>National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production</p> <p>[In accordance with 40 CFR 63.5790, 63.5795, and 63.5935, this emissions unit is an affected source engaged in the following operations: closed molding (RTM), cleaning of equipment, mixing, and HAP-containing materials storage at an existing reinforced plastic composites production facility subject to emission limits and/or work practice standards specified in this section.]</p>	Table 4 to 40 CFR Part 63, Subpart WWWW - Applicable Work Practice Standards. See b)(2)b. and c)(4).
e.	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 OC emission limitation for the coatings (resins and gel coats) employed in emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined, shall not exceed 20.0 TPY, based on a rolling, 12-month summation of the coating emissions.

For purposes of clarification of non-attainment new source review (NSR) permitting requirements and this Title V renewal permitting action, the permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC as defined in OAC rule 3745-21-01 shall be employed. The emission of non-VOC based cleanup materials does not count towards the Synthetic Minor Determination to avoid the Emission Offset Policy for VOC established in PTI 14-05196.



b. The closed molding (RTM) associated with this emissions unit is exempt from the requirements in 40 CFR Part 63, Subpart WWWW, pursuant to 63.5790(c). Only the cleaning of equipment, mixing, and HAP-containing material storage activities associated with this emissions unit are subject to requirements (work practice standards) in 40 CFR Part 63, Subpart WWWW, pursuant to 63.5790(b).

c) Operational Restrictions

(1) The maximum amount of all cleanup material employed in this emissions unit shall not exceed 3.0 gallons per day and 900 gallons per year.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

(2) The maximum OC content of the cleanup material employed in this emissions unit shall not exceed 6.6 pounds of OC per gallon of cleanup material.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

(3) The permittee shall not employ volatile organic compound (VOC) cleanup materials as VOC is defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5805(b) and Table 4; for cleaning operations	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment*.
63.5805(b) and Table 4; for HAP-containing materials storage	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.
63.5805(b) and Table 4; for mixing activities**	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
63.5805(b) and Table 4; for mixing activities**	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.
63.5805(b) and Table 4; for mixing activities**	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing



	covers to the mixing vessels.
--	-------------------------------

*The requirements of OAC rule 3745-31-05 restricting the VOC content of cleanup materials may be more stringent than the work practices listed above. The permittee shall comply with the most stringent requirement for cleanup material, as applicable.

**40 CFR 63.5935 defines the HAP-containing material mixing activities subject to Subpart WWWW. 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).

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day this emissions unit is in operation:
 - a. the company identification for each coating (resin) and cleanup material employed;
 - b. the number of pounds of each coating employed;
 - c. the OC content (assumed equal to the organic HAP), recorded in percent by weight, of each coating employed in this emissions unit;
 - d. the total number of gallons of cleanup material employed;
 - e. the OC content of the cleanup material employed, in pounds per gallon;
 - f. the OC emissions from the cleanup material employed, in pounds per day [(d) x (e)];
 - g. the OC emissions from all coatings employed, in pounds per day [the summation of (b) x (c) x 0.03* for all coatings employed];
 - h. the total number of hours this emissions unit was in operation;
 - i. the average hourly OC emission rate from all coatings, in pounds per hour [(g)/(h)]; and
 - j. a determination whether or not each cleanup material employed is a volatile organic compound (VOC), as defined in OAC rule 3745-21-01.

[Note: The coating information must be for the coatings, as employed, including any thinning solvents, additives, or catalysts added at the emissions unit].

*This emission factor represents a worst case 3% evaporation loss from closed molding based upon AP-42, Section 4.4, Table 4.4-2, dated 2/2007.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]



- (2) The permittee shall maintain monthly records of the following information for this emissions unit:
- a. the total number of gallons of cleanup material employed [summation of the information collected in d)(1)d. for all days of the calendar month];
 - b. the total OC emissions from the cleanup material employed, in pounds [summation of the information collected in d)(1)f. for all days of the calendar month];
 - c. the year-to-date total number of gallons of cleanup material employed [summation of the information collected in (a) for all months of the calendar year]; and
 - d. the year-to-date total OC emissions from the cleanup materials, in tons [summation of the information collected in (b) for all months of the calendar year, divided by 2000 pounds per ton].

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (3) The permittee shall collect and record the following information for each month for emissions units P006, P013 through P017, P021, P027, P028, P032, and P035:
- a. the total OC emissions from all the coatings employed, in tons, for each emissions unit [summation of the daily information collected for each emissions unit for all days of the calendar month, divided by 2000 pounds per ton];
 - b. the total OC emissions from all the coatings employed, in tons, for emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined [summation of the information collected in (a) for each month of the calendar year]; and
 - c. the updated rolling, 12-month summation of OC emissions from all the coatings employed, in tons, for emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (b)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5915(a)	copy of compliance notification(s) and report(s)
63.5915(d) and Table 9	certified statement of compliance with work practice requirements
63.5920(a) – (d)	record keeping format and retention requirements

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



- (5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install 14-05196: d)(1) - d)(4). The monitoring and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. the cleanup material usage restrictions;
 - b. the OC content limitation for the cleanup material;
 - c. the OC emission limitations for the cleanup material;
 - d. the non-VOC restriction for the cleanup material;
 - e. the hourly OC emission limitation for coatings;
 - f. the daily OC emission limitation for coatings; and
 - g. the rolling, 12-month OC emission limitation for all coatings employed in emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (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, including 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), (d), (g), and (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), (d), (g), and (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.



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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05196: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

- a. Emission Limitations:

OC emissions shall not exceed 1.5 pounds per hour and 40 pounds per day from coatings (resins).

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1).

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- b. Emission Limitation:

The annual OC emission limitation for the coatings employed in emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined, shall not exceed 20.0 TPY, based on a rolling, 12-month summation of the coating emissions.

Applicable Compliance Method:

Compliance with the combined 12-month rolling OC emission limitation above shall be determined by the record keeping requirements specified in d)(3).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- c. Emission Limitations:

OC emissions shall not exceed 19.8 pounds per day from cleanup material.

OC emissions shall not exceed 2.97 TPY from cleanup material.



Effective Date: To be entered upon final issuance

Applicable Compliance Method:

Compliance with the daily and annual OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2). Formulation data or US EPA Method 24 shall be used to determine the OC content of any cleanup material employed in this emissions unit.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

63.5840, 63.5860(a), and Table 9	initial compliance demonstration for work practice standards
63.5900(a)(4)	continuous compliance demonstration for work practice standards

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05196: f)(1) – f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

2. P020, Main Spray Booth Gel Coat

Operations, Property and/or Equipment Description:

Manual 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) (PTI 14-05196, issued 7/9/2002)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day from coatings (gel coats). OC emissions shall not exceed 9.9 pounds per day from cleanup materials. OC emissions shall not exceed 1.8 TPY from cleanup materials. PE/PM ₁₀ emissions shall not exceed 0.81 pound per hour. PE/PM ₁₀ emissions shall not exceed 4.1 pounds per day. See c)(1) - c)(3). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) (PTI 14-05196, issued 7/9/2002) Synthetic Minor to Avoid Major New Source Review	See b)(2)a. and c)(4). PE/PM ₁₀ emissions shall not exceed 0.51 TPY, based on a rolling, 12-month summation, for emissions unit P020.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
d.	OAC rule 3745-17-11(C)(3)	The PTI for this emissions unit was issued after January 1, 1990; therefore, the surface coating processes shall comply with the PE limitations established as Best Available Technology (BAT) under OAC rule 3745-31-05(A)(3), rather than the requirements of OAC rule 3745-17-11(C)(1) and (2).
e.	OAC rule 3745-21-25	The requirements of this rule for the control of VOC emissions are equivalent to, or less stringent than, the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions and the requirements established pursuant to OAC rule 3745-31-05 for OC/VOC emissions. Compliance with the emission limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-31-05 will satisfy the requirements of this rule.
f.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)</p> <p>National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production</p> <p>[In accordance with 40 CFR 63.5790, 63.5795, and 63.5935, this emissions unit is an affected source engaged in the following operations: open molding gel coat application, cleaning of equipment, mixing, and HAP-containing materials storage at an existing reinforced plastic composites production facility subject to emission limits and/or work practice standards specified in this section.]</p>	<p>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 gel coat application.</p> <p>See b)(2)b. for a listing of the specific emission limitations and b)(2)c. for compliance demonstration options.</p> <p>Table 4 to 40 CFR Part 63, Subpart WWWW - Applicable Work Practice Standards. See c)(5).</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR 63.1-15, Subpart A (40 CFR 63.5925)	Table 15 to 40 CFR Part 63, Subpart WWWW – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR Part 63.1 – 15 apply.

(2) Additional Terms and Conditions

- a. The annual OC emission limitation for all coatings (resins and gel coats) employed in emissions units P018, P019, and P020, combined, shall not exceed 15.0 TPY, based on a rolling, 12-month summation.

For purposes of clarification of non-attainment new source review (NSR) permitting requirements and this Title V renewal permitting action, the permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC as defined in OAC rule 3745-21-01 shall be employed. The emission of non-VOC based cleanup materials does not count towards the Synthetic Minor Determination to avoid the Emission Offset Policy for VOC established in PTI 14-05196.

- 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 . . .
6. open molding—gel coat ²	a. tooling gel coating	440 lb/ton.
	b. white/off white pigmented gel coating	267 lb/ton.
	c. all other pigmented gel coating	377 lb/ton.
	d. CR/HS or high performance gel coat	605 lb/ton.
	e. fire retardant gel coat	854 lb/ton.
	f. clear production gel coat	522 lb/ton.

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

²If 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. 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/gel coat compliance demonstration
63.5810(b)	average individual organic HAP emissions limit compliance demonstration for each resin/gel coat type
63.5810(c)	weighted average emission limit compliance demonstration

c) Operational Restrictions

- (1) The maximum amount of all cleanup material employed in this emissions unit shall not exceed 1.5 gallons per day and 550 gallons per year.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (2) The maximum OC content of the cleanup material employed in this emissions unit shall not exceed 6.6 pounds of OC per gallon of cleanup material.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

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

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

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (4) The permittee shall not employ volatile organic compound (VOC) cleanup materials as VOC is defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5805(b) and Table 4; for cleaning operations	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment*.
63.5805(b) and Table 4;	Keep containers that store HAP-containing materials closed

for HAP-containing materials storage	or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
63.5805(b) and Table 4; for mixing activities**	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
63.5805(b) and Table 4; for mixing activities**	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.
63.5805(b) and Table 4; for mixing activities**	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

*The requirements of OAC rule 3745-31-05 restricting the VOC content of cleanup materials may be more stringent than the work practices listed above. The permittee shall comply with the most stringent requirement for cleanup material, as applicable.

**40 CFR 63.5935 defines the HAP-containing material mixing activities subject to Subpart WWWW. 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).

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

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each day this emissions unit is in operation:
 - a. the company identification for each coating (gel coat) and cleanup material employed;
 - b. the number of pounds of each coating employed;
 - c. the OC content (assumed equal to the organic HAP), recorded in percent by weight, of each coating employed in this emissions unit;
 - d. the calculated OC/organic HAP emission factor, in pounds of OC/HAP per ton of coating employed, using the information in (c) and the appropriate equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW;
 - e. the total OC emissions from all coatings employed, in pounds per day [the summation of (b)/2000 x (d) for all coatings employed];
 - f. the total number of hours the emissions unit was in operation;



- g. the average hourly OC emission rate from all coatings, in pounds per hour [(e)/(f)];
- h. the total number of gallons of cleanup material employed;
- i. the OC content of the cleanup material employed, in pounds per gallon;
- j. the OC emissions from the cleanup material employed, in pounds per day [(h) x (i)];
- k. the total PE/PM₁₀ emissions, in pounds per day [the summation of (b) x (1 - OC/HAP content, percent by weight) x (1 - 0.75, the spray application transfer efficiency) x (1 - 0.985, the control efficiency of the dry filtration system)];
- l. the average hourly PE/PM₁₀ emission rate, in pounds per hour [(k)/(f)]; and
- m. a determination whether or not each cleanup material employed is a volatile organic compound (VOC), as defined in OAC rule 3745-21-01.

[Note: The coating information must be for the coatings as employed, including any thinning solvents, additives, and catalysts added at the emissions unit].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-31-05(D), and 40 CFR Part 63 Subpart WWWW]

- (2) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the total number of gallons of cleanup material employed [summation of the information collected in d)(1)h. for all days of the calendar month];
 - b. the total OC emissions from the cleanup material employed, in pounds [summation of the information collected in d)(1)j. for all days of the calendar month];
 - c. the year-to-date total number of gallons of cleanup material employed [summation of the information collected in (a) for all months of the calendar year];
 - d. the year-to-date total OC emissions from the cleanup materials, in tons [summation of the information collected in (b) for all months of the calendar year, divided by 2000 pounds per ton];
 - e. the total PE/PM₁₀ emissions, in tons [summation of the information collected in d)(1)k. for all days of the calendar month, divided by 2000 pounds per ton]; and
 - f. the updated rolling, 12-month summation of PE/PM₁₀ emissions, in tons [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (e)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]



- (3) The permittee shall collect and record the following information for each month for emissions units P018, P019, and P020:
- a. the total OC emissions from all the coatings employed, in tons, for each emissions unit [summation of the daily information collected for each emissions unit for all days of the calendar month, divided by 2000 pounds per ton];
 - b. the total OC emissions from all the coatings employed, in tons, for emissions units P018, P019, and P020, combined [summation of the information collected in (a) for each month of the calendar year]; and
 - c. the updated rolling, 12-month summation of OC emissions from all the coatings employed, in tons, for emissions units P018, P019, and P020, combined [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (b)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

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

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

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

63.5810(a)*	data collection and calculation methods for demonstrating compliance with individual resin/gel coat option*
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

*The permittee has elected to utilize the compliance demonstration option in 63.5810(a). Should the permittee choose to demonstrate compliance with the emission limitations listed in b)(2)b. by one of the alternative compliance demonstrations specified in b)(2)c., the permittee shall collect and record the information specified in 40 CFR 63.5810(b),(c), or (d), as appropriate. Use of an alternative compliance demonstration method shall be reported pursuant to 63.5910(i).

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

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (9) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be

made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (11) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install 14-05196: d)(1) - d)(10). The monitoring and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
- a. the cleanup material usage restrictions;
 - b. the OC content limitation for the cleanup material;
 - c. the OC emission limitations for the cleanup material;
 - d. the non-VOC restriction for the cleanup material;
 - e. the hourly OC emission limitation for coatings;
 - f. the daily OC emission limitation for coatings;
 - g. the hourly PE/PM₁₀ emission limitation;
 - h. the daily PE/PM₁₀ emission limitation;
 - i. the rolling, 12-month PE/PM₁₀ emission limitation;
 - j. the rolling, 12-month OC emission limitation for all coatings employed in emissions units P018, P019, and P020, combined; and

- k. any record showing that the dry particulate filter system was not in service or not operated according to manufacturer’s recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (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, including 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), (d), (g), and (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), (d), (g), and (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

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

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

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

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

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

- (5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05196: e)(1) - e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) **Testing Requirements**

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

a. **Emission Limitations:**

OC emissions shall not exceed 8 pounds per hour and 40 pounds per day from coatings (gel coats).

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1).

[Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

b. **Emission Limitation:**

The annual OC emission limitation for all coatings (resins and gel coats) employed in emissions units P018, P019, and P020, combined, shall not exceed 15.0 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the combined 12-month rolling OC emission limitation above shall be determined by the record keeping requirements specified in d)(3).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

c. **Emission Limitations:**

OC emissions shall not exceed 9.9 pounds per day from cleanup materials

OC emissions shall not exceed 1.8 TPY from cleanup materials.



Applicable Compliance Method:

Compliance with the daily and annual OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2). Formulation data or US EPA Method 24 shall be used to determine the OC content of any cleanup material employed in this emissions unit.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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 gel coat application [see b)(2)b. and 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 b)(2)c. of this permit, the record keeping in d)(1) and d)(5), and the compliance methods specified below in f)(2) of this permit.

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

e. Emission Limitations:

PE/PM₁₀ emissions shall not exceed 0.81 pound per hour; and

PE/PM₁₀ emissions shall not exceed 4.1 pounds per day.

Applicable Compliance Method:

Compliance with the hourly and daily PE/PM₁₀ emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1), which incorporate the spray application transfer efficiency and 98.5% particulate filter design control efficiency as provided by the permittee in the application for PTI 14-05196.

[Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

f. Emission Limitation:

PE/PM₁₀ emissions shall not exceed 0.51 TPY, based on a rolling, 12-month summation, for emissions unit P020.



Applicable Compliance Method:

Compliance with the 12-month rolling PE/PM₁₀ emission limitation above shall be determined by the record keeping requirements specified in d)(2).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

g. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

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

No Method 9 visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, when appropriate based upon the results of particulate filter monitoring, recordkeeping, and reporting, Method 9 visible emissions observations will be required pursuant to OAC rule 3745-15-04(A).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A)(1), and 3745-31-05(A)(3)]

- (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
63.5840 and 63.5860(a)	initial compliance demonstration
63.5895(c)-(d) and 63.5900(a)	continuous compliance demonstrations

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05196: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.



Draft Title V Permit
Core Composites Cincinnati, LLC

Permit Number: P0119666

Facility ID: 1413020248

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



3. P022, Robot (Venus) Gel Coat Booth

Operations, Property and/or Equipment Description:

Robotic Gel Coat Applicator 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) (PTI 14-05223, issued 1/31/2002)	OC emissions shall not exceed 10 pounds per hour and 157 pounds per day from coatings (gel coat). OC emissions shall not exceed 13.2 pounds per day from cleanup materials. OC emissions shall not exceed 1.16 TPY from cleanup materials. PE/PM ₁₀ emissions shall not exceed 0.39 pound per hour. PE/PM ₁₀ emissions shall not exceed 6.07 pounds per day. PE/PM ₁₀ emissions shall not exceed 0.60 TPY. See c)(1) - c)(8). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) (PTI 14-05223, issued 1/31/2002) Synthetic Minor to Avoid Major New	See b)(2)a., c)(4), and c)(5).



Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	Source Review	
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
d.	OAC rule 3745-17-11(C)(3)	The PTI for this emissions unit was issued after January 1, 1990; therefore, the surface coating processes shall comply with the PE limitations established as Best Available Technology (BAT) under OAC rule 3745-31-05(A)(3), rather than the requirements of OAC rule 3745-17-11(C)(1) and (2).
e.	OAC rule 3745-21-25	The requirements of this rule for the control of VOC emissions are equivalent to, or less stringent than, the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions and the requirements established pursuant to OAC rule 3745-31-05 for OC/VOC emissions. Compliance with the emission limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-31-05 will satisfy the requirements of this rule.
f.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)</p> <p>National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production</p> <p>[In accordance with 40 CFR 63.5790, 63.5795, and 63.5935, this emissions unit is an affected source engaged in the following operations: open molding gel coat application, cleaning of equipment, mixing, and HAP-containing materials storage at an existing reinforced plastic composites production facility subject to emission limits and/or work practice standards specified in this section.]</p>	<p>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 gel coat application.</p> <p>See b)(2)b. for a listing of the specific emission limitations and b)(2)c. for compliance demonstration options.</p> <p>Table 4 to 40 CFR Part 63, Subpart WWWW - Applicable Work Practice Standards. See c)(9).</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR 63.1-15, Subpart A (40 CFR 63.5925)	Table 15 to 40 CFR Part 63, Subpart WWWW – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR Part 63.1 – 15 apply.

(2) Additional Terms and Conditions

- a. The annual OC emission limitation for all coatings (gel coats) employed in this emissions unit shall not exceed 15.5 TPY, based on a rolling 12-month summation.

For purposes of clarification of non-attainment new source review (NSR) permitting requirements and this Title V renewal permitting action, the permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC as defined in OAC rule 3745-21-01 shall be employed. The emission of non-VOC based cleanup materials does not count towards the Synthetic Minor Determination to avoid the Emission Offset Policy for VOC established in PTI 14-05223.

- 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 . . .
6. open molding—gel coat ²	a. tooling gel coating	440 lb/ton.
	b. white/off white pigmented gel coating	267 lb/ton.
	c. all other pigmented gel coating	377 lb/ton.
	d. CR/HS or high performance gel coat	605 lb/ton.
	e. fire retardant gel coat	854 lb/ton.
	f. clear production gel coat	522 lb/ton.

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

²If 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. 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/gel coat compliance demonstration
63.5810(b)	average individual organic HAP emissions limit compliance demonstration for each resin/gel coat type
63.5810(c)	weighted average emission limit compliance demonstration

c) Operational Restrictions

- (1) The maximum amount of all cleanup material employed in this emissions unit shall not exceed 2.0 gallons per day and 350 gallons per year.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (2) The maximum OC content of the cleanup material employed in this emissions unit shall not exceed 6.6 pounds of OC per gallon.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (3) The OC (styrene) content of the coating (gel coats) shall not exceed the following limitations:

- a. 50%, by weight, as applied for each clear gel coat (clear gel coat is gel coat without pigment); and
- b. 45%, by weight, as applied for each pigmented gel coat (pigmented gel coat is clear gel coat with pigments added).

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (4) The amount of coating (gel coat) used in this emissions unit shall not exceed 144 pounds per hour, 2,248 pounds per day, and 220.95 tons per year. The tons per year limitation is based upon a rolling, 12-month summation.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (5) The permittee shall not employ volatile organic compound (VOC) cleanup materials as VOC is defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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



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

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (7) The permittee shall electronically monitor the amount of coating pumped by this emissions unit.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (8) The permittee shall only utilize robotic application equipment in this emissions unit.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

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

63.5805(b) and Table 4; for cleaning operations	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment*.
63.5805(b) and Table 4; for HAP-containing materials storage	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.
63.5805(b) and Table 4; for mixing activities**	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
63.5805(b) and Table 4; for mixing activities**	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.
63.5805(b) and Table 4; for mixing activities**	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

*The requirements of OAC rule 3745-31-05 restricting the VOC content of cleanup materials may be more stringent than the work practices listed above. The permittee shall comply with the most stringent requirement for cleanup material, as applicable.

**40 CFR 63.5935 defines the HAP-containing material mixing activities subject to Subpart WWWW. 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).

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

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each day this emissions unit is in operation:
 - a. the company identification for each coating (gel coat) and cleanup material employed, including the type of gel coat employed (clear or pigmented);
 - b. the number of pounds of each coating employed;
 - c. the OC content (assumed equal to the organic HAP), recorded in percent by weight, of each coating employed in this emissions unit;
 - d. the calculated OC/organic HAP emission factor, in pounds of OC/HAP per ton of coating employed, using the information in (c) and the appropriate equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW;
 - e. the total OC emissions from all coatings employed, in pounds per day [the summation of (b)/2000 x (d) for all coatings employed];
 - f. the total number of hours the emissions unit was in operation;
 - g. the average hourly usage rate for all coatings, in pounds per hour [the summation of (b) for all coatings employed, divided by (f)];
 - h. the average hourly OC emission rate from all coatings, in pounds per hour [(e)/(f)];
 - i. the total number of gallons of cleanup material employed;
 - j. the OC content of the cleanup material employed, in pounds per gallon;
 - k. the OC emissions from the cleanup material employed, in pounds per day [(i) x (j)];
 - l. the total PE/PM₁₀ emissions, in pounds per day [the summation of (b) x (1 - OC/HAP content, percent by weight) x (1 - 0.75, the spray application transfer efficiency) x (1 - 0.985, the control efficiency of the dry filtration system)];
 - m. the average hourly PE/PM₁₀ emission rate, in pounds per hour [(l)/(f)]; and
 - n. a determination whether or not each cleanup material employed is a volatile organic compound (VOC), as defined in OAC rule 3745-21-01.



[Note: The coating information must be for the coatings as employed, including any thinning solvents, additives, and catalysts added at the emissions unit].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-31-05(D), and 40 CFR Part 63 Subpart WWWW]

- (2) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the total number of gallons of cleanup material employed [summation of the information collected in d)(1)i. for all days of the calendar month];
 - b. the total OC emissions from the cleanup material employed, in pounds [summation of the information collected in d)(1)k. for all days of the calendar month];
 - c. the year-to-date total number of gallons of cleanup material employed [summation of the information collected in (a) for all months of the calendar year];
 - d. the year-to-date total OC emissions from the cleanup materials, in tons [summation of the information collected in (b) for all months of the calendar year, divided by 2000 pounds per ton];
 - e. the total PE/PM₁₀ emissions, in pounds [summation of the information collected in d)(1)l. for all days of the calendar month];
 - f. the year-to-date total PE/PM₁₀ emissions, in tons [summation of the information collected in (e) for all months of the calendar year, divided by 2000 pounds per ton];
 - g. the total amount of coatings employed, in pounds [summation of the information collected in d)(1)b. for all days of the calendar month];
 - h. the updated rolling, 12-month summation of the total amount of coatings employed, in tons [this shall include the total usage for the current month, plus the total for the preceding eleven calendar months from the information collected in (g), divided by 2000 pounds per ton];
 - i. the total OC emissions from all the coatings employed, in pounds [summation of the information collected in d)(1)e. for all days of the calendar month];
 - j. the updated rolling, 12-month summation of OC emissions from all the coatings employed, in tons [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (i), divided by 2000 pounds per ton].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (3) The permittee shall operate and maintain metering equipment to measure the amount of all coatings (resins/gel coats) used in the emissions unit. The permittee shall calibrate the metering equipment to measure the amount, in weight or volume, of all coatings



(resins/gel coats) used in the emissions unit as necessary or appropriate to maintain the accuracy of the measurements guaranteed or specified by the manufacturer of the metering equipment, or to an accuracy of within plus or minus five percent (5%) of the true value, whichever is more stringent.

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

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

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

63.5810(a)*	data collection and calculation methods for demonstrating compliance with individual resin/gel coat option*
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

*The permittee has elected to utilize the compliance demonstration option in 63.5810(a). Should the permittee choose to demonstrate compliance with the emission limitations listed in b)(2)b. by one of the alternative compliance demonstrations specified in b)(2)c., the permittee shall collect and record the information specified in 40 CFR 63.5810(b),(c), or (d), as appropriate. Use of an alternative compliance demonstration method shall be reported pursuant to 63.5910(i).

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

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

- a. the date of the inspection;
- b. a description of each/any problem identified and the date it was corrected;
- c. a description of any maintenance and repairs performed; and
- d. the name of person who performed the inspection.

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (10) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install 14-05223: d)(1) - d)(9). The monitoring and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
- a. the cleanup material usage restrictions;
 - b. the OC content limitation for the cleanup material;
 - c. the OC emission limitations for the cleanup material;
 - d. the non-VOC restriction for the cleanup material;
 - e. the OC (styrene) content limitation, in percent by weight, for coatings;
 - f. the coating usage restrictions;
 - g. the hourly OC emission limitation for coatings;
 - h. the daily OC emission limitation for coatings;
 - i. the hourly PE/PM₁₀ emission limitation;
 - j. the daily PE/PM₁₀ emission limitation;
 - k. the annual PE/PM₁₀ emission limitation;
 - l. the rolling, 12-month OC emission limitation for all the coatings employed; and
 - m. any record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (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, including 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), (d), (g), and (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), (d), (g), and (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

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

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

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

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

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

- (5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05223: e)(1) - e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) **Testing Requirements**

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

a. **Emission Limitations:**

OC emissions shall not exceed 10 pounds per hour and 157 pounds per day from coatings (gel coat).

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1).

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]



b. Emission Limitation:

The annual OC emission limitation for all coatings (gel coats) employed in this emissions unit shall not exceed 15.5 TPY, based on a rolling 12-month summation.

Applicable Compliance Method:

Compliance with the combined 12-month rolling OC emission limitation above shall be determined by the record keeping requirements specified in d)(2).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

c. Emission Limitations:

OC emissions shall not exceed 13.2 pounds per day from cleanup materials; and
OC emissions shall not exceed 1.16 TPY from cleanup materials.

Applicable Compliance Method:

Compliance with the daily and annual OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2). Formulation data or US EPA Method 24 shall be used to determine the OC content of any cleanup material employed in this emissions unit.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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 gel coat application [see b)(2)b. and 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 b)(2)c. of this permit, the record keeping in d)(1) and d)(4), and the compliance methods specified below in f)(2) of this permit.

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



e. Emission Limitations:

PE/PM₁₀ emissions shall not exceed 0.39 pound per hour;

PE/PM₁₀ emissions shall not exceed 6.07 pounds per day; and

PE/PM₁₀ emissions shall not exceed 0.60 TPY.

Applicable Compliance Method:

Compliance with the PE/PM₁₀ emission limitations above shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2), which incorporate the spray application transfer efficiency and 98.5% particulate filter design control efficiency as provided by the permittee in the application for PTI 14-05223.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

f. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

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

No Method 9 visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, when appropriate based upon the results of particulate filter monitoring, recordkeeping, and reporting, Method 9 visible emissions observations will be required pursuant to OAC rule 3745-15-04(A).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A)(1), and 3745-31-05(A)(3)]

- (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
63.5840 and 63.5860(a)	initial compliance demonstration
63.5895(c)-(d) and 63.5900(a)	continuous compliance demonstrations

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



Draft Title V Permit
Core Composites Cincinnati, LLC
Permit Number: P0119666
Facility ID: 1413020248

Effective Date: To be entered upon final issuance

(3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05223: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.



4. P025, Main Spray Booth Gel Coat - 2

Operations, Property and/or Equipment Description:

Main Gel Coat Spray Booth 2

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05196, issued 7/9/2002)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day from coatings (gel coat). OC emissions shall not exceed 3.3 pounds per day from cleanup materials. OC emissions shall not exceed 0.495 TPY from cleanup materials. PE/PM ₁₀ emissions shall not exceed 0.28 pound per hour. PE/PM ₁₀ emissions shall not exceed 1.38 pounds per day. See c)(1) - c)(3). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) (PTI 14-05196, issued 7/9/2002) Synthetic Minor to Avoid Major New Source Review	See b)(2)a. and c)(4). PE/PM ₁₀ emissions shall not exceed 0.18 TPY, based on a rolling, 12-month summation.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
d.	OAC rule 3745-17-11(C)(3)	The PTI for this emissions unit was issued after January 1, 1990; therefore, the surface coating processes shall comply with the PE limitations established as Best Available Technology (BAT) under OAC rule 3745-31-05(A)(3), rather than the requirements of OAC rule 3745-17-11(C)(1) and (2).
e.	OAC rule 3745-21-25	The requirements of this rule for the control of VOC emissions are equivalent to, or less stringent than, the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions and the requirements established pursuant to OAC rule 3745-31-05 for OC/VOC emissions. Compliance with the emission limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-31-05 will satisfy the requirements of this rule.
f.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)</p> <p>National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production</p> <p>[In accordance with 40 CFR 63.5790, 63.5795, and 63.5935, this emissions unit is an affected source engaged in the following operations: open molding gel coat application, cleaning of equipment, mixing, and HAP-containing materials storage at an existing reinforced plastic composites production facility subject to emission limits and/or work practice standards specified in this section.]</p>	<p>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 gel coat application.</p> <p>See b)(2)b. for a listing of the specific emission limitations and b)(2)c. for compliance demonstration options.</p> <p>Table 4 to 40 CFR Part 63, Subpart WWWW - Applicable Work Practice Standards. See c)(5).</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR 63.1-15, Subpart A (40 CFR 63.5925)	Table 15 to 40 CFR Part 63, Subpart WWWW – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR Part 63.1 – 15 apply.

(2) Additional Terms and Conditions

- a. The annual OC emission limitation for all coatings (gel coats) employed in this emissions unit shall not exceed 7.0 TPY, based on a rolling 12-month summation.

For purposes of clarification of non-attainment new source review (NSR) permitting requirements and this Title V renewal permitting action, the permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC as defined in OAC rule 3745-21-01 shall be employed. The emission of non-VOC based cleanup materials does not count towards the Synthetic Minor Determination to avoid the Emission Offset Policy for VOC established in PTI 14-05196.

- 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 . . .
6. open molding—gel coat ²	a. tooling gel coating	440 lb/ton.
	b. white/off white pigmented gel coating	267 lb/ton.
	c. all other pigmented gel coating	377 lb/ton.
	d. CR/HS or high performance gel coat	605 lb/ton.
	e. fire retardant gel coat	854 lb/ton.
	f. clear production gel coat	522 lb/ton.

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

²If 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. 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/gel coat compliance demonstration
63.5810(b)	average individual organic HAP emissions limit compliance demonstration for each resin/gel coat type
63.5810(c)	weighted average emission limit compliance demonstration

c) Operational Restrictions

- (1) The maximum amount of all cleanup material employed in this emissions unit shall not exceed 0.5 gallon per day and 150 gallons per year.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (2) The maximum OC content of the cleanup material employed in this emissions unit shall not exceed 6.6 lbs of OC/gallon.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

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

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

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (4) The permittee shall not employ volatile organic compound (VOC) cleanup materials as VOC is defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5805(b) and Table 4; for cleaning operations	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment*.
---	---

63.5805(b) and Table 4; for HAP-containing materials storage	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.
63.5805(b) and Table 4; for mixing activities**	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
63.5805(b) and Table 4; for mixing activities**	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.
63.5805(b) and Table 4; for mixing activities**	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

*The requirements of OAC rule 3745-31-05 restricting the VOC content of cleanup materials may be more stringent than the work practices listed above. The permittee shall comply with the most stringent requirement for cleanup material, as applicable.

**40 CFR 63.5935 defines the HAP-containing material mixing activities subject to Subpart WWWW. 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).

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

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each day this emissions unit is in operation:
 - a. the company identification for each coating (gel coat) and cleanup material employed;
 - b. the number of pounds of each coating employed;
 - c. the OC content (assumed equal to the organic HAP), recorded in percent by weight, of each coating employed in this emissions unit;
 - d. the calculated OC/organic HAP emission factor, in pounds of OC/HAP per ton of coating employed, using the information in (c) and the appropriate equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW;
 - e. the total OC emissions from all coatings employed, in pounds per day [the summation of (b)/2000 x (d) for all coatings employed];
 - f. the total number of hours the emissions unit was in operation;

- g. the average hourly OC emission rate from all coatings, in pounds per hour [(e)/(f)];
- h. the total number of gallons of cleanup material employed;
- i. the OC content of the cleanup material employed, in pounds per gallon;
- j. the OC emissions from the cleanup material employed, in pounds per day [(h) x (i)];
- k. the total PE/PM₁₀ emissions, in pounds per day [the summation of (b) x (1 - OC/HAP content, percent by weight) x (1 - 0.75, the spray application transfer efficiency) x (1 - 0.985, the control efficiency of the dry filtration system)];
- l. the average hourly PE/PM₁₀ emission rate, in pounds per hour [(k)/(f)]; and
- m. a determination whether or not each cleanup material employed is a volatile organic compound (VOC), as defined in OAC rule 3745-21-01.

[Note: The coating information must be for the coatings as employed, including any thinning solvents, additives, and catalysts added at the emissions unit].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-31-05(D), and 40 CFR Part 63 Subpart WWWW]

- (2) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the total number of gallons of cleanup material employed [summation of the information collected in d)(1)h. for all days of the calendar month];
 - b. the total OC emissions from the cleanup material employed, in pounds [summation of the information collected in d)(1)j. for all days of the calendar month];
 - c. the year-to-date total number of gallons of cleanup material employed [summation of the information collected in (a) for all months of the calendar year];
 - d. the year-to-date total OC emissions from the cleanup materials, in tons [summation of the information collected in (b) for all months of the calendar year, divided by 2000 pounds per ton];
 - e. the total PE/PM₁₀ emissions, in tons [summation of the information collected in d)(1)k. for all days of the calendar month, divided by 2000 pounds per ton];
 - f. the updated rolling, 12-month summation of PE/PM₁₀ emissions, in tons [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (e)];
 - g. the total OC emissions from all the coatings employed, in pounds [summation of the information collected in d)(1)e. for all days of the calendar month]; and



- h. the updated rolling, 12-month summation of OC emissions from all the coatings employed, in tons [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (g), divided by 2000 pounds per ton].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

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

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

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

63.5810(a)*	data collection and calculation methods for demonstrating compliance with individual resin/gel coat option*
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

*The permittee has elected to utilize the compliance demonstration option in 63.5810(a). Should the permittee choose to demonstrate compliance with the emission limitations listed in b)(2)b. by one of the alternative compliance demonstrations specified in b)(2)c.,

the permittee shall collect and record the information specified in 40 CFR 63.5810(b),(c), or (d), as appropriate. Use of an alternative compliance demonstration method shall be reported pursuant to 63.5910(i).

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

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (9) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications

made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (10) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install 14-05196: d)(1) - d)(9). The monitoring and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
- a. the cleanup material usage restrictions;
 - b. the OC content limitation for the cleanup material;
 - c. the OC emission limitations for the cleanup material;
 - d. the non-VOC restriction for the cleanup material;
 - e. the hourly OC emission limitation for coatings;
 - f. the daily OC emission limitation for coatings;
 - g. the hourly PE/PM₁₀ emission limitation;
 - h. the daily PE/PM₁₀ emission limitation;
 - i. the rolling, 12-month PE/PM₁₀ emission limitation;
 - j. the rolling, 12-month OC emission limitation for all the coatings employed; and
 - k. any record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)].

- (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, including 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), (d), (g), and (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), (d), (g), and (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

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

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

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

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

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

- (5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05196: e)(1) - e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) **Testing Requirements**

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



a. Emission Limitations:

OC emissions shall not exceed 8 pounds per hour and 40 pounds per day from coatings (gel coats).

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1).

[Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

b. Emission Limitation:

The annual OC emission limitation for all coatings (gel coats) employed in this emissions unit shall not exceed 7.0 TPY, based on a rolling 12-month summation.

Applicable Compliance Method:

Compliance with the 12-month rolling OC emission limitation above shall be determined by the record keeping requirements specified in d)(2).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

c. Emission Limitations:

OC emissions shall not exceed 3.3 pounds per day from cleanup materials

OC emissions shall not exceed 0.495 TPY from cleanup materials

Applicable Compliance Method:

Compliance with the daily and annual OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2). Formulation data or US EPA Method 24 shall be used to determine the OC content of any cleanup material employed in this emissions unit.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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 gel coat application [see b)(2)b. and 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 b)(2)c. of this permit, the record keeping in d)(1) and d)(4), and the compliance methods specified below in f)(2) of this permit.

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

e. Emission Limitations:

PE/PM₁₀ emissions shall not exceed 0.28 pound per hour; and

PE/PM₁₀ emissions shall not exceed 1.38 pounds per day.

Applicable Compliance Method:

Compliance with the hourly and daily PE/PM₁₀ emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1), which incorporate the spray application transfer efficiency and 98.5% particulate filter design control efficiency as provided by the permittee in the application for PTI 14-05196.

[Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

f. Emission Limitation:

PE/PM₁₀ emissions shall not exceed 0.18 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the 12-month rolling PE/PM₁₀ emission limitation above shall be determined by the record keeping requirements specified in d)(2).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

g. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

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



No Method 9 visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, when appropriate based upon the results of particulate filter monitoring, recordkeeping, and reporting, Method 9 visible emissions observations will be required pursuant to OAC rule 3745-15-04(A).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A)(1), and 3745-31-05(A)(3)]

- (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
63.5840 and 63.5860(a)	initial compliance demonstration
63.5895(c)-(d) and 63.5900(a)	continuous compliance demonstrations

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05196: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.



5. P027, Service Gel Coat Main Bldg - 2

Operations, Property and/or Equipment Description:

Service Gel Coat 2 Main Bldg

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05196, issued 7/9/2002)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day from coatings (gel coats). OC emissions shall not exceed 3.3 pounds per day from cleanup materials. OC emissions shall not exceed 0.495 TPY from cleanup materials. PE/PM ₁₀ emissions shall not exceed 0.28 pound per hour. PE/PM ₁₀ emissions shall not exceed 1.38 pounds per day. See c)(1) - c)(3). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) (PTI 14-05196, issued 7/9/2002) Synthetic Minor to Avoid Major New Source Review	See b)(2)a. and c)(4). PE/PM ₁₀ emissions shall not exceed 0.24 TPY, based on a rolling, 12-month summation, for emissions unit P027.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
d.	OAC rule 3745-17-11(C)(3)	The PTI for this emissions unit was issued after January 1, 1990; therefore, the surface coating processes shall comply with the PE limitations established as Best Available Technology (BAT) under OAC rule 3745-31-05(A)(3), rather than the requirements of OAC rule 3745-17-11(C)(1) and (2).
e.	OAC rule 3745-21-25	The requirements of this rule for the control of VOC emissions are equivalent to, or less stringent than, the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions and the requirements established pursuant to OAC rule 3745-31-05 for OC/VOC emissions. Compliance with the emission limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-31-05 will satisfy the requirements of this rule.
f.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)</p> <p>National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production</p> <p>[In accordance with 40 CFR 63.5790, 63.5795, and 63.5935, this emissions unit is an affected source engaged in the following operations: open molding gel coat application, cleaning of equipment, mixing, and HAP-containing materials storage at an existing reinforced plastic composites production facility subject to emission limits and/or work practice standards specified in this section.]</p>	<p>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 gel coat application.</p> <p>See b)(2)b. for a listing of the specific emission limitations and b)(2)c. for compliance demonstration options.</p> <p>Table 4 to 40 CFR Part 63, Subpart WWWW - Applicable Work Practice Standards. See c)(5).</p>
g.	40 CFR 63.1-15, Subpart A (40 CFR 63.5925)	Table 15 to 40 CFR Part 63, Subpart WWWW - Applicability of General Provisions (Subpart A) to Subpart



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		WWWW shows which parts of the General Provisions in 40 CFR Part 63.1 – 15 apply.

(2) Additional Terms and Conditions

- a. The annual OC emission limitation for the coatings (resins and gel coats) employed in emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined, shall not exceed 20.0 TPY, based on a rolling, 12-month summation of the coating emissions.

For purposes of clarification of non-attainment new source review (NSR) permitting requirements and this Title V renewal permitting action, the permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC as defined in OAC rule 3745-21-01 shall be employed. The emission of non-VOC based cleanup materials does not count towards the Synthetic Minor Determination to avoid the Emission Offset Policy for VOC established in PTI 14-05196.

- 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 . . .
6. open molding—gel coat ²	a. tooling gel coating	440 lb/ton.
	b. white/off white pigmented gel coating	267 lb/ton.
	c. all other pigmented gel coating	377 lb/ton.
	d. CR/HS or high performance gel coat	605 lb/ton.
	e. fire retardant gel coat	854 lb/ton.
	f. clear production gel coat	522 lb/ton.

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

²If 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. 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/gel coat compliance demonstration
63.5810(b)	average individual organic HAP emissions limit compliance demonstration for each resin/gel coat type
63.5810(c)	weighted average emission limit compliance demonstration

c) Operational Restrictions

- (1) The maximum amount of all cleanup material employed in this emissions unit shall not exceed 0.5 gallon per day and 150 gallons per year.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (2) The maximum OC content of the cleanup material employed in this emissions unit shall not exceed 6.6 lbs of OC/gallon.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

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

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

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (4) The permittee shall not employ volatile organic compound (VOC) cleanup materials as VOC is defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5805(b) and Table 4; for cleaning operations	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment*.
63.5805(b) and Table 4; for HAP-containing materials storage	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.

63.5805(b) and Table 4; for mixing activities**	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
63.5805(b) and Table 4; for mixing activities**	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.
63.5805(b) and Table 4; for mixing activities**	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

*The requirements of OAC rule 3745-31-05 restricting the VOC content of cleanup materials may be more stringent than the work practices listed above. The permittee shall comply with the most stringent requirement for cleanup material, as applicable.

**40 CFR 63.5935 defines the HAP-containing material mixing activities subject to Subpart WWWW. 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).

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day this emissions unit is in operation:
 - a. the company identification for each coating (gel coat) and cleanup material employed;
 - b. the number of pounds of each coating employed;
 - c. the OC content (assumed equal to the organic HAP), recorded in percent by weight, of each coating employed in this emissions unit;
 - d. the calculated OC/organic HAP emission factor, in pounds of OC/HAP per ton of coating employed, using the information in (c) and the appropriate equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW;
 - e. the total OC emissions from all coatings employed, in pounds per day [the summation of (b)/2000 x (d) for all coatings employed];
 - f. the total number of hours the emissions unit was in operation;
 - g. the average hourly OC emission rate from all coatings, in pounds per hour [(e)/(f)];
 - h. the total number of gallons of cleanup material employed;



- i. the OC content of the cleanup material employed, in pounds per gallon;
- j. the OC emissions from the cleanup material employed, in pounds per day [(h) x (i)];
- k. the total PE/PM₁₀ emissions, in pounds per day [the summation of (b) x (1 - OC/HAP content, percent by weight) x (1 - 0.75, the spray application transfer efficiency) x (1 - 0.985, the control efficiency of the dry filtration system)];
- l. the average hourly PE/PM₁₀ emission rate, in pounds per hour [(k)/(f)]; and
- m. a determination whether or not each cleanup material employed is a volatile organic compound (VOC), as defined in OAC rule 3745-21-01.

[Note: The coating information must be for the coatings as employed, including any thinning solvents, additives, and catalysts added at the emissions unit].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-31-05(D), and 40 CFR Part 63 Subpart WWWW]

- (2) The permittee shall maintain monthly records of the following information for this emissions unit:

- a. the total number of gallons of cleanup material employed [summation of the information collected in d)(1)h. for all days of the calendar month];
- b. the total OC emissions from the cleanup material employed, in pounds [summation of the information collected in d)(1)j. for all days of the calendar month];
- c. the year-to-date total number of gallons of cleanup material employed [summation of the information collected in (a) for all months of the calendar year];
- d. the year-to-date total OC emissions from the cleanup materials, in tons [summation of the information collected in (b) for all months of the calendar year, divided by 2000 pounds per ton];
- e. the total PE/PM₁₀ emissions, in tons [summation of the information collected in d)(1)k. for all days of the calendar month, divided by 2000 pounds per ton]; and
- f. the updated rolling, 12-month summation of PE/PM₁₀ emissions, in tons [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (e)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (3) The permittee shall collect and record the following information for each month for emissions units P006, P013 through P017, P021, P027, P028, P032, and P035:



- a. the total OC emissions from all the coatings employed, in tons, for each emissions unit [summation of the daily information collected for each emissions unit for all days of the calendar month, divided by 2000 pounds per ton];
- b. the total OC emissions from all the coatings employed, in tons, for emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined [summation of the information collected in (a) for each month of the calendar year]; and
- c. the updated rolling, 12-month summation of OC emissions from all the coatings employed, in tons, for emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (b)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

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

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

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

63.5810(a)*	data collection and calculation methods for demonstrating compliance with individual resin/gel coat option*
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

*The permittee has elected to utilize the compliance demonstration option in 63.5810(a). Should the permittee choose to demonstrate compliance with the emission limitations listed in b)(2)b. by one of the alternative compliance demonstrations specified in b)(2)c., the permittee shall collect and record the information specified in 40 CFR 63.5810(b),(c), or (d), as appropriate. Use of an alternative compliance demonstration method shall be reported pursuant to 63.5910(i).

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

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (9) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (11) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install 14-05196: d)(1) - d)(10). The monitoring and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
- a. the daily cleanup material usage restriction;
 - b. the OC content limitation for the cleanup material;
 - c. the daily OC emission limitation for the cleanup material;
 - d. the non-VOC restriction for the cleanup material;
 - e. the hourly OC emission limitation for coatings;
 - f. the daily OC emission limitation for coatings;
 - g. the hourly PE/PM₁₀ emission limitation;
 - h. the daily PE/PM₁₀ emission limitation;
 - i. the rolling, 12-month PE/PM₁₀ emission limitation;
 - j. the rolling, 12-month OC emission limitation for all coatings employed in emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined; and

- k. any record showing that the dry particulate filter system was not in service or not operated according to manufacturer’s recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (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, including 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), (d), (g), and (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), (d), (g), and (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

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

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

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

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

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



(5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05196: e)(1) - e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitations:

OC emissions shall not exceed 8 pounds per hour and 40 pounds per day from coatings (gel coats).

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1).

[Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

b. Emission Limitation:

The annual OC emission limitation for the coatings employed in emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined, shall not exceed 20.0 TPY, based on a rolling, 12-month summation of the coating emissions.

Applicable Compliance Method:

Compliance with the combined 12-month rolling OC emission limitation above shall be determined by the record keeping requirements specified in d)(3).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

c. Emission Limitations:

OC emissions shall not exceed 3.3 pounds per day from cleanup materials

OC emissions shall not exceed 0.495 TPY from cleanup materials



Applicable Compliance Method:

Compliance with the daily and annual OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2). Formulation data or US EPA Method 24 shall be used to determine the OC content of any cleanup material employed in this emissions unit.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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 gel coat application [see b)(2)b. and 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 b)(2)c. of this permit, the record keeping in d)(1) and d)(5), and the compliance methods specified below in f)(2) of this permit.

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

e. Emission Limitations:

PE/PM₁₀ emissions shall not exceed 0.28 pound per hour; and

PE/PM₁₀ emissions shall not exceed 1.38 pounds per day.

Applicable Compliance Method:

Compliance with the hourly and daily PE/PM₁₀ emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1), which incorporate the spray application transfer efficiency and 98.5% particulate filter design control efficiency as provided by the permittee in the application for PTI 14-05196.

[Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

f. Emission Limitation:

PE/PM₁₀ emissions shall not exceed 0.24 TPY, based on a rolling, 12-month summation, for emissions unit P027.



Applicable Compliance Method:

Compliance with the 12-month rolling PE/PM₁₀ emission limitation above shall be determined by the record keeping requirements specified in d)(2).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

g. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

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

No Method 9 visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, when appropriate based upon the results of particulate filter monitoring, recordkeeping, and reporting, Method 9 visible emissions observations will be required pursuant to OAC rule 3745-15-04(A).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A)(1), and 3745-31-05(A)(3)]

- (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
63.5840 and 63.5860(a)	initial compliance demonstration
63.5895(c)-(d) and 63.5900(a)	continuous compliance demonstrations

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05196: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.



Draft Title V Permit
Core Composites Cincinnati, LLC

Permit Number: P0119666

Facility ID: 1413020248

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.

6. P028, Service Gel Coat Main Bldg - 3

Operations, Property and/or Equipment Description:

Service Gel Coat 3 Main Bldg

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05196, issued 7/9/2002)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day from coatings (gel coats). OC emissions shall not exceed 3.3 pounds per day from cleanup materials. OC emissions shall not exceed 0.495 TPY from cleanup materials. PE/PM ₁₀ emissions shall not exceed 0.28 pound per hour. PE/PM ₁₀ emissions shall not exceed 1.38 pounds per day. See c)(1) - c)(3). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) (PTI 14-05196, issued 7/9/2002) Synthetic Minor to Avoid Major New Source Review	See b)(2)a. and c)(4). PE/PM ₁₀ emissions shall not exceed 0.06 TPY, based on a rolling, 12-month summation, for emissions unit P028.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
d.	OAC rule 3745-17-11(C)(3)	The PTI for this emissions unit was issued after January 1, 1990; therefore, the surface coating processes shall comply with the PE limitations established as Best Available Technology (BAT) under OAC rule 3745-31-05(A)(3), rather than the requirements of OAC rule 3745-17-11(C)(1) and (2).
e.	OAC rule 3745-21-25	The requirements of this rule for the control of VOC emissions are equivalent to, or less stringent than, the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions and the requirements established pursuant to OAC rule 3745-31-05 for OC/VOC emissions. Compliance with the emission limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-31-05 will satisfy the requirements of this rule.
f.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)</p> <p>National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production</p> <p>[In accordance with 40 CFR 63.5790, 63.5795, and 63.5935, this emissions unit is an affected source engaged in the following operations: open molding gel coat application, cleaning of equipment, mixing, and HAP-containing materials storage at an existing reinforced plastic composites production facility subject to emission limits and/or work practice standards specified in this section.]</p>	<p>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 gel coat application.</p> <p>See b)(2)b. for a listing of the specific emission limitations and b)(2)c. for compliance demonstration options.</p> <p>Table 4 to 40 CFR Part 63, Subpart WWWW - Applicable Work Practice Standards. See c)(5).</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR 63.1-15, Subpart A (40 CFR 63.5925)	Table 15 to 40 CFR Part 63, Subpart WWWW – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR Part 63.1 – 15 apply.

(2) Additional Terms and Conditions

- a. The annual OC emission limitation for the coatings (resins and gel coats) employed in emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined, shall not exceed 20.0 TPY, based on a rolling, 12-month summation of the coating emissions.

For purposes of clarification of non-attainment new source review (NSR) permitting requirements and this Title V renewal permitting action, the permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC as defined in OAC rule 3745-21-01 shall be employed. The emission of non-VOC based cleanup materials does not count towards the Synthetic Minor Determination to avoid the Emission Offset Policy for VOC established in PTI 14-05196.

- 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 . . .
6. open molding—gel coat ²	a. tooling gel coating	440 lb/ton.
	b. white/off white pigmented gel coating	267 lb/ton.
	c. all other pigmented gel coating	377 lb/ton.
	d. CR/HS or high performance gel coat	605 lb/ton.
	e. fire retardant gel coat	854 lb/ton.
	f. clear production gel coat	522 lb/ton.

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

²If 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. 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/gel coat compliance demonstration
63.5810(b)	average individual organic HAP emissions limit compliance demonstration for each resin/gel coat type
63.5810(c)	weighted average emission limit compliance demonstration

c) Operational Restrictions

- (1) The maximum amount of all cleanup material employed in this emissions unit shall not exceed 0.5 gallon per day and 150 gallons per year.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (2) The maximum OC content of the cleanup material employed in this emissions unit shall not exceed 6.6 lbs of OC/gallon.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

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

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

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (4) The permittee shall not employ volatile organic compound (VOC) cleanup materials as VOC is defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5805(b) and Table 4; for cleaning operations	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment*.
63.5805(b) and Table 4;	Keep containers that store HAP-containing materials closed

for HAP-containing materials storage	or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
63.5805(b) and Table 4; for mixing activities**	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
63.5805(b) and Table 4; for mixing activities**	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.
63.5805(b) and Table 4; for mixing activities**	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

*The requirements of OAC rule 3745-31-05 restricting the VOC content of cleanup materials may be more stringent than the work practices listed above. The permittee shall comply with the most stringent requirement for cleanup material, as applicable.

**40 CFR 63.5935 defines the HAP-containing material mixing activities subject to Subpart WWWW. 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).

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

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each day this emissions unit is in operation:
 - a. the company identification for each coating (gel coat) and cleanup material employed;
 - b. the number of pounds of each coating employed;
 - c. the OC content (assumed equal to the organic HAP), recorded in percent by weight, of each coating employed in this emissions unit;
 - d. the calculated OC/organic HAP emission factor, in pounds of OC/HAP per ton of coating employed, using the information in (c) and the appropriate equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW;
 - e. the total OC emissions from all coatings employed, in pounds per day [the summation of (b)/2000 x (d) for all coatings employed];
 - f. the total number of hours the emissions unit was in operation;



- g. the average hourly OC emission rate from all coatings, in pounds per hour [(e)/(f)];
- h. the total number of gallons of cleanup material employed;
- i. the OC content of the cleanup material employed, in pounds per gallon;
- j. the OC emissions from the cleanup material employed, in pounds per day [(h) x (i)];
- k. the total PE/PM₁₀ emissions, in pounds per day [the summation of (b) x (1 - OC/HAP content, percent by weight) x (1 - 0.75, the spray application transfer efficiency) x (1 - 0.985, the control efficiency of the dry filtration system)];
- l. the average hourly PE/PM₁₀ emission rate, in pounds per hour [(k)/(f)]; and
- m. a determination whether or not each cleanup material employed is a volatile organic compound (VOC), as defined in OAC rule 3745-21-01.

[Note: The coating information must be for the coatings as employed, including any thinning solvents, additives, and catalysts added at the emissions unit].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-31-05(D), and 40 CFR Part 63 Subpart WWWW]

- (2) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the total number of gallons of cleanup material employed [summation of the information collected in d)(1)h. for all days of the calendar month];
 - b. the total OC emissions from the cleanup material employed, in pounds [summation of the information collected in d)(1)j. for all days of the calendar month];
 - c. the year-to-date total number of gallons of cleanup material employed [summation of the information collected in (a) for all months of the calendar year];
 - d. the year-to-date total OC emissions from the cleanup materials, in tons [summation of the information collected in (b) for all months of the calendar year, divided by 2000 pounds per ton];
 - e. the total PE/PM₁₀ emissions, in tons [summation of the information collected in d)(1)k. for all days of the calendar month, divided by 2000 pounds per ton]; and
 - f. the updated rolling, 12-month summation of PE/PM₁₀ emissions, in tons [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (e)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]



- (3) The permittee shall collect and record the following information for each month for emissions units P006, P013 through P017, P021, P027, P028, P032, and P035:
- a. the total OC emissions from all the coatings employed, in tons, for each emissions unit [summation of the daily information collected for each emissions unit for all days of the calendar month, divided by 2000 pounds per ton];
 - b. the total OC emissions from all the coatings employed, in tons, for emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined [summation of the information collected in (a) for each month of the calendar year]; and
 - c. the updated rolling, 12-month summation of OC emissions from all the coatings employed, in tons, for emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (b)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

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

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

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

63.5810(a)*	data collection and calculation methods for demonstrating compliance with individual resin/gel coat option*
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

*The permittee has elected to utilize the compliance demonstration option in 63.5810(a). Should the permittee choose to demonstrate compliance with the emission limitations listed in b)(2)b. by one of the alternative compliance demonstrations specified in b)(2)c., the permittee shall collect and record the information specified in 40 CFR 63.5810(b),(c), or (d), as appropriate. Use of an alternative compliance demonstration method shall be reported pursuant to 63.5910(i).

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

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (9) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (11) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install 14-05196: d)(1) - d)(10). The monitoring and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
- a. the cleanup material usage restrictions;
 - b. the OC content limitation for the cleanup material;
 - c. the OC emission limitations for the cleanup material;
 - d. the non-VOC restriction for the cleanup material;
 - e. the hourly OC emission limitation for coatings;
 - f. the daily OC emission limitation for coatings;
 - g. the hourly PE/PM₁₀ emission limitation;
 - h. the daily PE/PM₁₀ emission limitation;
 - i. the rolling, 12-month PE/PM₁₀ emission limitation;
 - j. the rolling, 12-month OC emission limitation for all coatings employed in emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined; and

- k. any record showing that the dry particulate filter system was not in service or not operated according to manufacturer’s recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (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, including 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), (d), (g), and (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), (d), (g), and (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

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

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

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

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

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

- (5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to



Install 14-05196: e)(1) - e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitations:

OC emissions shall not exceed 8 pounds per hour and 40 pounds per day from coatings (gel coats).

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1).

[Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

b. Emission Limitation:

The annual OC emission limitation for the coatings employed in emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined, shall not exceed 20.0 TPY, based on a rolling, 12-month summation of the coating emissions.

Applicable Compliance Method:

Compliance with the combined 12-month rolling OC emission limitation above shall be determined by the record keeping requirements specified in d)(3).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

c. Emission Limitations:

OC emissions shall not exceed 3.3 pounds per day from cleanup materials

OC emissions shall not exceed 0.495 TPY from cleanup materials

Applicable Compliance Method:

Compliance with the daily and annual OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2). Formulation data or US EPA Method 24 shall be used to



determine the OC content of any cleanup material employed in this emissions unit.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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 gel coating application [see b)(2)b. and 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 b)(2)c. of this permit, the record keeping in d)(1) and d)(5), and the compliance methods specified below in f)(2) of this permit.

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

e. Emission Limitations:

PE/PM₁₀ emissions shall not exceed 0.28 pound per hour; and

PE/PM₁₀ emissions shall not exceed 1.38 pounds per day.

Applicable Compliance Method:

Compliance with the hourly and daily PE/PM₁₀ emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1), which incorporate the spray application transfer efficiency and 98.5% particulate filter design control efficiency as provided by the permittee in the application for PTI 14-05196.

[Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

f. Emission Limitation:

PE/PM₁₀ emissions shall not exceed 0.06 TPY, based on a rolling, 12-month summation, for emissions unit P028.

Applicable Compliance Method:

Compliance with the 12-month rolling PE/PM₁₀ emission limitation above shall be determined by the record keeping requirements specified in d)(2).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]



g. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

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

No Method 9 visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, when appropriate based upon the results of particulate filter monitoring, recordkeeping, and reporting, Method 9 visible emissions observations will be required pursuant to OAC rule 3745-15-04(A).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A)(1), and 3745-31-05(A)(3)]

- (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
63.5840 and 63.5860(a)	initial compliance demonstration
63.5895(c)-(d) and 63.5900(a)	continuous compliance demonstrations

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05196: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.



7. P030, Service Gel Coat Bldg B - 1

Operations, Property and/or Equipment Description:

Robotic Gel Coat Applicator 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) (PTI 14-05474, issued 3/9/2004)	OC emissions shall not exceed 10.1 pounds per hour and 157 pounds per day from coatings (gel coat). OC emissions shall not exceed 13.2 pounds per day from cleanup materials. OC emissions shall not exceed 2.4 TPY from cleanup materials. PE/PM ₁₀ emissions shall not exceed 0.39 pound per hour. PE/PM ₁₀ emissions shall not exceed 6.07 pounds per day. PE/PM ₁₀ emissions shall not exceed 0.60 TPY. See c)(1) - c)(8). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D), 3745-17-07(A)(1), and 40 CFR Part 63, Subpart WWWW.
b.	OAC rule 3745-31-05(D) (PTI 14-05474, issued 3/9/2004) Synthetic Minor to Avoid Major New	See b)(2)a., c)(4), and c)(5).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	Source Review	
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
d.	OAC rule 3745-17-11(C)(3)	The PTI for this emissions unit was issued after January 1, 1990; therefore, the surface coating processes shall comply with the PE limitations established as Best Available Technology (BAT) under OAC rule 3745-31-05(A)(3), rather than the requirements of OAC rule 3745-17-11(C)(1) and (2).
e.	OAC rule 3745-21-25	The requirements of this rule for the control of VOC emissions are equivalent to, or less stringent than, the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions and the requirements established pursuant to OAC rule 3745-31-05 for OC/VOC emissions. Compliance with the emission limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-31-05 will satisfy the requirements of this rule.
f.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)</p> <p>National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production</p> <p>[In accordance with 40 CFR 63.5790, 63.5795, and 63.5935, this emissions unit is an affected source engaged in the following operations: open molding gel coat application, cleaning of equipment, mixing, and HAP-containing materials storage at an existing reinforced plastic composites production facility subject to emission limits and/or work practice standards specified in this section.]</p>	<p>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 gel coat application.</p> <p>See b)(2)b. for a listing of the specific emission limitations and b)(2)c. for compliance demonstration options.</p> <p>Table 4 to 40 CFR Part 63, Subpart WWWW - Applicable Work Practice Standards. See c)(9).</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR 63.1-15, Subpart A (40 CFR 63.5925)	Table 15 to 40 CFR Part 63, Subpart WWWW – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR Part 63.1 – 15 apply.

(2) Additional Terms and Conditions

- a. The annual OC emission limitation for all coatings (gel coats) employed in this emissions unit shall not exceed 15.5 TPY, based on a rolling 12-month summation.

The annual OC emission limitation for the coatings (resins and gel coats) employed in emissions units P002 through P005, P030, P031, P033, and P034, combined, shall not exceed 25.0 TPY, based on a rolling, 12-month summation of the coating emissions.

For purposes of clarification of non-attainment new source review (NSR) permitting requirements and this Title V renewal permitting action, the permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC as defined in OAC rule 3745-21-01 shall be employed. The emission of non-VOC based cleanup materials does not count towards the Synthetic Minor Determination to avoid the Emission Offset Policy for VOC established in PTI 14-05474.

- 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 . . .
6. open molding—gel coat ²	a. tooling gel coating	440 lb/ton.
	b. white/off white pigmented gel coating	267 lb/ton.
	c. all other pigmented gel coating	377 lb/ton.
	d. CR/HS or high performance gel coat	605 lb/ton.
	e. fire retardant gel coat	854 lb/ton.
	f. clear production gel coat	522 lb/ton.

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

²If 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. 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/gel coat compliance demonstration
63.5810(b)	average individual organic HAP emissions limit compliance demonstration for each resin/gel coat type
63.5810(c)	weighted average emission limit compliance demonstration

c) Operational Restrictions

- (1) The maximum amount of all cleanup material employed in this emissions unit shall not exceed 2.0 gallons per day and 720 gallons per year.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (2) The maximum OC content of the cleanup material employed in this emissions unit shall not exceed 6.6 pounds of OC per gallon.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (3) The OC (styrene) content of the coating (gel coats) shall not exceed the following limitations:

- a. 50%, by weight, as applied for each clear gel coat (clear gel coat is gel coat without pigment); and
- b. 45%, by weight, as applied for each pigmented gel coat (pigmented gel coat is clear gel coat with pigments added).

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (4) The amount of coating (gel coat) used in this emissions unit shall not exceed 144 pounds per hour, 2,248 pounds per day, and 220.95 tons per year. The tons per year limitation is based upon a rolling, 12-month summation.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (5) The permittee shall not employ volatile organic compound (VOC) cleanup materials as VOC is defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

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

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (7) The permittee shall electronically monitor the amount of coating pumped by this emissions unit.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (8) The permittee shall only utilize robotic application equipment in this emissions unit.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

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

63.5805(b) and Table 4; for cleaning operations	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment*.
63.5805(b) and Table 4; for HAP-containing materials storage	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.
63.5805(b) and Table 4; for mixing activities**	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
63.5805(b) and Table 4; for mixing activities**	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.
63.5805(b) and Table 4; for mixing activities**	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

*The requirements of OAC rule 3745-31-05 restricting the VOC content of cleanup materials may be more stringent than the work practices listed above. The permittee shall comply with the most stringent requirement for cleanup material, as applicable.

**40 CFR 63.5935 defines the HAP-containing material mixing activities subject to Subpart WWWW. 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).

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 40 CFR Part 63, Subpart WWWW]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each day this emissions unit is in operation:
 - a. the company identification for each coating (gel coat) and cleanup material employed, including the type of gel coat employed (clear or pigmented);
 - b. the number of pounds of each coating employed;
 - c. the OC content (assumed equal to the organic HAP), recorded in percent by weight, of each coating employed in this emissions unit;
 - d. the calculated OC/organic HAP emission factor, in pounds of OC/HAP per ton of coating employed, using the information in (c) and the appropriate equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW;
 - e. the total OC emissions from all coatings employed, in pounds per day [the summation of (b)/2000 x (d) for all coatings employed];
 - f. the total number of hours the emissions unit was in operation;
 - g. the average hourly usage rate for all coatings, in pounds per hour [the summation of (b) for all coatings employed, divided by (f)];
 - h. the average hourly OC emission rate from all coatings, in pounds per hour [(e)/(f)];
 - i. the total number of gallons of cleanup material employed;
 - j. the OC content of the cleanup material employed, in pounds per gallon;
 - k. the OC emissions from the cleanup material employed, in pounds per day [(i) x (j)];
 - l. the total PE/PM₁₀ emissions, in pounds per day [the summation of (b) x (1 - OC/HAP content, percent by weight) x (1 - 0.75, the spray application transfer efficiency) x (1 - 0.985, the control efficiency of the dry filtration system)];
 - m. the average hourly PE/PM₁₀ emission rate, in pounds per hour [(l)/(f)]; and
 - n. a determination whether or not each cleanup material employed is a volatile organic compound (VOC), as defined in OAC rule 3745-21-01.



[Note: The coating information must be for the coatings as employed, including any thinning solvents, additives, and catalysts added at the emissions unit].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-31-05(D), and 40 CFR Part 63 Subpart WWWW]

- (2) The permittee shall maintain monthly records of the following information for this emissions unit:
- a. the total number of gallons of cleanup material employed [summation of the information collected in d)(1)i. for all days of the calendar month];
 - b. the total OC emissions from the cleanup material employed, in pounds [summation of the information collected in d)(1)k. for all days of the calendar month];
 - c. the year-to-date total number of gallons of cleanup material employed [summation of the information collected in (a) for all months of the calendar year];
 - d. the year-to-date total OC emissions from the cleanup materials, in tons [summation of the information collected in (b) for all months of the calendar year, divided by 2000 pounds per ton];
 - e. the total PE/PM₁₀ emissions, in pounds [summation of the information collected in d)(1)l. for all days of the calendar month];
 - f. the year-to-date total PE/PM₁₀ emissions, in tons [summation of the information collected in (e) for all months of the calendar year, divided by 2000 pounds per ton];
 - g. the total amount of coatings employed, in pounds [summation of the information collected in d)(1)b. for all days of the calendar month];
 - h. the updated rolling, 12-month summation of the total amount of coatings employed, in tons [this shall include the total usage for the current month, plus the total for the preceding eleven calendar months from the information collected in (g), divided by 2000 pounds per ton];
 - i. the total OC emissions from all the coatings employed, in pounds [summation of the information collected in d)(1)e. for all days of the calendar month];
 - j. the updated rolling, 12-month summation of OC emissions from all the coatings employed, in tons [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (i), divided by 2000 pounds per ton].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (3) The permittee shall collect and record the following information for each month for emissions units P002 through P005, P030, P031, P033, and P034:



- a. the total OC emissions from all the coatings employed, in tons, for each emissions unit [summation of the daily information collected for each emissions unit for all days of the calendar month, divided by 2000 pounds per ton];
- b. the total OC emissions from all the coatings employed, in tons, for emissions units P002 through P005, P030, P031, P033, and P034, combined [summation of the information collected in (a) for each month of the calendar year]; and
- c. the updated rolling, 12-month summation of OC emissions from all the coatings employed, in tons, for emissions units P002 through P005, P030, P031, P033, and P034, combined [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (b)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

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

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

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

63.5810(a)*	data collection and calculation methods for demonstrating compliance with individual resin/gel coat option*
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

*The permittee has elected to utilize the compliance demonstration option in 63.5810(a). Should the permittee choose to demonstrate compliance with the emission limitations listed in b)(2)b. by one of the alternative compliance demonstrations specified in b)(2)c., the permittee shall collect and record the information specified in 40 CFR 63.5810(b),(c), or (d), as appropriate. Use of an alternative compliance demonstration method shall be reported pursuant to 63.5910(i).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 40 CFR Part 63, Subpart WWWW]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (9) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be

made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (11) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install 14-05474: d)(1) - d)(10). The monitoring and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
- a. the cleanup material usage restrictions;
 - b. the OC content limitation for the cleanup material;
 - c. the OC emission limitations for the cleanup material;
 - d. the non-VOC restriction for the cleanup material;
 - e. the OC (styrene) content limitation, in percent by weight, for coatings;
 - f. the coating usage restrictions;
 - g. the hourly OC emission limitation for coatings;
 - h. the daily OC emission limitation for coatings;
 - i. the hourly PE/PM₁₀ emission limitation;
 - j. the daily PE/PM₁₀ emission limitation;
 - k. the annual PE/PM₁₀ emission limitation;
 - l. the rolling, 12-month OC emission limitation from all the coatings employed;



- m. the rolling, 12-month OC emission limitation for all coatings employed in emissions units P002 through P005, P030, P031, P033, and P034, combined; and,
- n. any record showing that the dry particulate filter system was not in service or not operated according to manufacturer’s recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (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, including 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), (d), (g), and (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), (d), (g), and (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 40 CFR Part 63, Subpart WWWW]

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

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

- (4) The permittee shall submit calibration and accuracy test results for the metering equipment and measuring equipment specified in d)(4) of the terms and conditions of this permit. The calibration and accuracy tests results shall be submitted to the



Southwest Ohio Air Quality Agency by January 30 and July 30 of each calendar year, and shall cover the previous six-month period.

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

- (5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05474: e)(1) - e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

- a. Emission Limitations:

OC emissions shall not exceed 10.1 pounds per hour and 157 pounds per day from coatings (gel coat).

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1).

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- b. Emission Limitation:

The annual OC emission limitation for all coatings (gel coats) employed in this emissions unit shall not exceed 15.5 TPY, based on a rolling 12-month summation.

The annual OC emission limitation for the coatings employed in emissions units P002 through P005, P030, P031, P033 and P034, combined, shall not exceed 25.0 TPY, based on a rolling, 12-month summation of the coating emissions.

Applicable Compliance Method:

Compliance with the 12-month rolling OC emission limitations above shall be determined by the record keeping requirements specified in d)(2) and d)(3).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]



c. Emission Limitations:

OC emissions shall not exceed 13.2 pounds per day from cleanup materials.

OC emissions shall not exceed 2.4 tons per year from cleanup materials.

Applicable Compliance Method:

Compliance with the daily and annual OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2). Formulation data or US EPA Method 24 shall be used to determine the OC content of any cleanup material employed in this emissions unit.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)].

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 gel coating application [see b)(2)b. and 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 b)(2)c. of this permit, the record keeping in d)(1) and d)(5), and the compliance methods specified below in f)(2) of this permit.

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

e. Emission Limitations:

PE/PM₁₀ emissions shall not exceed 0.39 pound per hour;

PE/PM₁₀ emissions shall not exceed 6.07 pounds per day; and

PE/PM₁₀ emissions shall not exceed 0.60 TPY.

Applicable Compliance Method:

Compliance with the PE/PM₁₀ emission limitations above shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2), which incorporate the spray application transfer efficiency and 98.5% particulate filter design control efficiency as provided by the permittee in the application for PTI 14-05474.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]



f. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

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

No Method 9 visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, when appropriate based upon the results of particulate filter monitoring, recordkeeping, and reporting, Method 9 visible emissions observations will be required pursuant to OAC rule 3745-15-04(A).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A)(1), and 3745-31-05(A)(3)]

- (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
63.5840 and 63.5860(a)	initial compliance demonstration
63.5895(c)-(d) and 63.5900(a)	continuous compliance demonstrations

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 40 CFR Part 63, Subpart WWWW]

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05474: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

8. P031, Service Gel Coat Bldg B - 2

Operations, Property and/or Equipment Description:

Service Gel Coat 2 Bldg B

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05196, issued 7/9/2002)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day from coatings (gel coats). OC emissions shall not exceed 3.3 pounds per day from cleanup materials. OC emissions shall not exceed 0.495 TPY from cleanup materials. PE/PM ₁₀ emissions shall not exceed 0.28 pound per hour. PE/PM ₁₀ emissions shall not exceed 1.38 pounds per day. See c)(1) - c)(3). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) (PTI 14-05196, issued 7/9/2002) Synthetic Minor to Avoid Major New Source Review	See b)(2)a. and c)(4). PE/PM ₁₀ emissions shall not exceed 0.06 TPY, based on a rolling, 12-month summation, for emissions unit P031.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
d.	OAC rule 3745-17-11(C)(3)	The PTI for this emissions unit was issued after January 1, 1990; therefore, the surface coating processes shall comply with the PE limitations established as Best Available Technology (BAT) under OAC rule 3745-31-05(A)(3), rather than the requirements of OAC rule 3745-17-11(C)(1) and (2).
e.	OAC rule 3745-21-25	The requirements of this rule for the control of VOC emissions are equivalent to, or less stringent than, the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions and the requirements established pursuant to OAC rule 3745-31-05 for OC/VOC emissions. Compliance with the emission limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-31-05 will satisfy the requirements of this rule.
f.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)</p> <p>National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production</p> <p>[In accordance with 40 CFR 63.5790, 63.5795, and 63.5935, this emissions unit is an affected source engaged in the following operations: open molding gel coat application, cleaning of equipment, mixing, and HAP-containing materials storage at an existing reinforced plastic composites production facility subject to emission limits and/or work practice standards specified in this section.]</p>	<p>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 gel coat application.</p> <p>See b)(2)b. for a listing of the specific emission limitations and b)(2)c. for compliance demonstration options.</p> <p>Table 4 to 40 CFR Part 63, Subpart WWWW - Applicable Work Practice Standards. See c)(5).</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR 63.1-15, Subpart A (40 CFR 63.5925)	Table 15 to 40 CFR Part 63, Subpart WWWW – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR Part 63.1 – 15 apply.

(2) Additional Terms and Conditions

- a. The annual OC emission limitation for the coatings (resins and gel coats) employed in emissions units P002 through P005, P030, P031, P033, and P034, combined, shall not exceed 25.0 TPY, based on a rolling, 12-month summation of the coating emissions.

For purposes of clarification of non-attainment new source review (NSR) permitting requirements and this Title V renewal permitting action, the permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC as defined in OAC rule 3745-21-01 shall be employed. The emission of non-VOC based cleanup materials does not count towards the Synthetic Minor Determination to avoid the Emission Offset Policy for VOC established in PTI 14-05196.

- 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 . . .
6. open molding—gel coat ²	a. tooling gel coating	440 lb/ton.
	b. white/off white pigmented gel coating	267 lb/ton.
	c. all other pigmented gel coating	377 lb/ton.
	d. CR/HS or high performance gel coat	605 lb/ton.
	e. fire retardant gel coat	854 lb/ton.
	f. clear production gel coat	522 lb/ton.

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

²If 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. 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/gel coat compliance demonstration
63.5810(b)	average individual organic HAP emissions limit compliance demonstration for each resin/gel coat type
63.5810(c)	weighted average emission limit compliance demonstration

c) Operational Restrictions

- (1) The maximum amount of all cleanup material employed in this emissions unit shall not exceed 0.5 gallon per day and 150 gallons per year.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (2) The maximum OC content of the cleanup material employed in this emissions unit shall not exceed 6.6 lbs of OC/gallon.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

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

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

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (4) The permittee shall not employ volatile organic compound (VOC) cleanup materials as VOC is defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5805(b) and Table 4; for cleaning operations	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment*.
63.5805(b) and Table 4;	Keep containers that store HAP-containing materials closed

for HAP-containing materials storage	or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
63.5805(b) and Table 4; for mixing activities**	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
63.5805(b) and Table 4; for mixing activities**	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.
63.5805(b) and Table 4; for mixing activities**	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

*The requirements of OAC rule 3745-31-05 restricting the VOC content of cleanup materials may be more stringent than the work practices listed above. The permittee shall comply with the most stringent requirement for cleanup material, as applicable.

**40 CFR 63.5935 defines the HAP-containing material mixing activities subject to Subpart WWWW. 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).

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day this emissions unit is in operation:
 - a. the company identification for each coating (gel coat) and cleanup material employed;
 - b. the number of pounds of each coating employed;
 - c. the OC content (assumed equal to the organic HAP), recorded in percent by weight, of each coating employed in this emissions unit;
 - d. the calculated OC/organic HAP emission factor, in pounds of OC/HAP per ton of coating employed, using the information in (c) and the appropriate equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW;
 - e. the total OC emissions from all coatings employed, in pounds per day [the summation of (b)/2000 x (d) for all coatings employed];
 - f. the total number of hours the emissions unit was in operation;



- g. the average hourly OC emission rate from all coatings, in pounds per hour [(e)/(f)];
- h. the total number of gallons of cleanup material employed;
- i. the OC content of the cleanup material employed, in pounds per gallon;
- j. the OC emissions from the cleanup material employed, in pounds per day [(h) x (i)];
- k. the total PE/PM₁₀ emissions, in pounds per day [the summation of (b) x (1 - OC/HAP content, percent by weight) x (1 - 0.75, the spray application transfer efficiency) x (1 - 0.985, the control efficiency of the dry filtration system)];
- l. the average hourly PE/PM₁₀ emission rate, in pounds per hour [(k)/(f)]; and
- m. a determination whether or not each cleanup material employed is a volatile organic compound (VOC), as defined in OAC rule 3745-21-01.

[Note: The coating information must be for the coatings as employed, including any thinning solvents, additives, and catalysts added at the emissions unit].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-31-05(D), and 40 CFR Part 63 Subpart WWWW]

- (2) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the total number of gallons of cleanup material employed [summation of the information collected in d)(1)h. for all days of the calendar month];
 - b. the total OC emissions from the cleanup material employed, in pounds [summation of the information collected in d)(1)j. for all days of the calendar month];
 - c. the year-to-date total number of gallons of cleanup material employed [summation of the information collected in (a) for all months of the calendar year];
 - d. the year-to-date total OC emissions from the cleanup materials, in tons [summation of the information collected in (b) for all months of the calendar year, divided by 2000 pounds per ton];
 - e. the total PE/PM₁₀ emissions, in tons [summation of the information collected in d)(1)k. for all days of the calendar month, divided by 2000 pounds per ton]; and
 - f. the updated rolling, 12-month summation of PE/PM₁₀ emissions, in tons [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (e)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]



- (3) The permittee shall collect and record the following information for each month for emissions units P002 through P005, P030, P031, P033, and P034:
- a. the total OC emissions from all the coatings employed, in tons, for each emissions unit [summation of the daily information collected for each emissions unit for all days of the calendar month, divided by 2000 pounds per ton];
 - b. the total OC emissions from all the coatings employed, in tons, for emissions units P002 through P005, P030, P031, P033, and P034, combined [summation of the information collected in (a) for each month of the calendar year]; and
 - c. the updated rolling, 12-month summation of OC emissions from all the coatings employed, in tons, for emissions units P002 through P005, P030, P031, P033, and P034, combined [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (b)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

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

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

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

63.5810(a)*	data collection and calculation methods for demonstrating compliance with individual resin/gel coat option*
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

*The permittee has elected to utilize the compliance demonstration option in 63.5810(a). Should the permittee choose to demonstrate compliance with the emission limitations listed in b)(2)b. by one of the alternative compliance demonstrations specified in b)(2)c., the permittee shall collect and record the information specified in 40 CFR 63.5810(b),(c), or (d), as appropriate. Use of an alternative compliance demonstration method shall be reported pursuant to 63.5910(i).

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

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (9) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (11) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install 14-05196: d)(1) - d)(10). The monitoring and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. the cleanup material usage restrictions;
 - b. the OC content limitation for the cleanup material;
 - c. the OC emission limitations for the cleanup material;
 - d. the non-VOC restriction for the cleanup material;
 - e. the hourly OC emission limitation for coatings;
 - f. the daily OC emission limitation for coatings;
 - g. the hourly PE/PM₁₀ emission limitation;
 - h. the daily PE/PM₁₀ emission limitation;
 - i. the rolling, 12-month PE/PM₁₀ emission limitation;
 - j. the rolling, 12-month OC emission limitation for all coatings employed in emissions units P002 through P005, P030, P031, P033, and P034, combined; and

- k. any record showing that the dry particulate filter system was not in service or not operated according to manufacturer’s recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (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, including 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), (d), (g), and (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), (d), (g), and (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

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

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

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

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

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

- (5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to

Install 14-05196: e)(1) - e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitations:

OC emissions shall not exceed 8 pounds per hour and 40 pounds per day from coatings (gel coats).

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1).

[Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

b. Emission Limitation:

The annual OC emission limitation for the coatings employed in emissions units P002 through P005, P030, P031, P033 and P034, combined, shall not exceed 25.0 TPY, based on a rolling, 12-month summation of the coating emissions.

Applicable Compliance Method:

Compliance with the combined 12-month rolling OC emission limitation above shall be determined by the record keeping requirements specified in d)(3).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

c. Emission Limitations:

OC emissions shall not exceed 3.3 pounds per day from cleanup materials.

OC emissions shall not exceed 0.495 TPY from cleanup materials.



Applicable Compliance Method:

Compliance with the daily and annual OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2). Formulation data or US EPA Method 24 shall be used to determine the OC content of any cleanup material employed in this emissions unit.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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 gel coating application [see b)(2)b. and 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 b)(2)c. of this permit, the record keeping in d)(1) and d)(5), and the compliance methods specified below in f)(2) of this permit.

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

e. Emission Limitations:

PE/PM₁₀ emissions shall not exceed 0.28 pound per hour; and

PE/PM₁₀ emissions shall not exceed 1.38 pounds per day

Applicable Compliance Method:

Compliance with the hourly and daily PE/PM₁₀ emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1), which incorporate the spray application transfer efficiency and 98.5% particulate filter design control efficiency as provided by the permittee in the application for PTI 14-05196.

[Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

f. Emission Limitation:

PE/PM₁₀ emissions shall not exceed 0.06 TPY, based on a rolling, 12-month summation, for emissions unit P031.



Applicable Compliance Method:

Compliance with the 12-month rolling PE/PM₁₀ emission limitation above shall be determined by the record keeping requirements specified in d)(2).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

g. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

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

No Method 9 visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, when appropriate based upon the results of particulate filter monitoring, recordkeeping, and reporting, Method 9 visible emissions observations will be required pursuant to OAC rule 3745-15-04(A).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A)(1), and 3745-31-05(A)(3)]

- (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
63.5840 and 63.5860(a)	initial compliance demonstration
63.5895(c)-(d) and 63.5900(a)	continuous compliance demonstrations

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05196: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.



Draft Title V Permit
Core Composites Cincinnati, LLC

Permit Number: P0119666

Facility ID: 1413020248

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

- (1) None.

9. P036, Hand Layup Area

Operations, Property and/or Equipment Description:

Hand Layup 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) (PTI 14-05196, issued 7/9/2002)	OC emissions shall not exceed 1.0 pounds per hour and 40 pounds per day from coatings (resins). OC emissions shall not exceed 19.8 pounds per day from cleanup materials. OC emissions shall not exceed 2.97 TPY from cleanup materials. See c)(1) and c)(2). Compliance with this rule also includes compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (PTI 14-05196, issued 7/9/2002) Synthetic Minor to Avoid Major New Source Review	See b)(2)a. and c)(3).
c.	OAC rule 3745-21-25	The requirements of this rule for the control of VOC emissions are equivalent to, or less stringent than, the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions and the requirements established pursuant to OAC rule 3745-31-05 for OC/VOC emissions. Compliance with the emission



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-31-05 will satisfy the requirements of this rule.
d.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)</p> <p>National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production</p> <p>[In accordance with 40 CFR 63.5790, 63.5795, and 63.5935, this emissions unit is an affected source engaged in the following operations: open molding using manual resin application, cleaning of equipment, mixing, and HAP-containing materials storage at an existing reinforced plastic composites production facility subject to emission limits and/or work practice standards specified in this section.]</p>	<p>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 using manual resin application.</p> <p>See b)(2)b. for a listing of the specific emission limitations and b)(2)c. for compliance demonstration options.</p> <p>Table 4 to 40 CFR Part 63, Subpart WWWW - Applicable Work Practice Standards. See c)(4).</p>
e.	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 OC emission limitation for all coatings (resins) employed in this emissions unit shall not exceed 1.0 TPY, based on a rolling, 12-month summation.

For purposes of clarification of non-attainment new source review (NSR) permitting requirements and this Title V renewal permitting action, the permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC as defined in OAC rule 3745-21-01 shall be employed. The emission of non-VOC based cleanup materials does not count towards the Synthetic Minor Determination to avoid the Emission Offset Policy for VOC established in PTI 14-05196.



- 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—CR/HS	c. manual resin application	123 lb/ton.
2. open molding—non-CR/HS	c. manual resin application	87 lb/ton.
3. open molding—tooling	c. manual resin application	157 lb/ton.
4. open molding—low-flame spread/low-smoke products	c. manual resin application	238 lb/ton.
5. open molding—shrinkage controlled resins ²	c. manual resin application	180 lb/ton.

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

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

- c. 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/gel coat compliance demonstration
63.5810(b)	average individual organic HAP emissions limit compliance demonstration for each resin/gel coat type
63.5810(c)	weighted average emission limit compliance demonstration
63.5810(d)	resin and application method compliance demonstration

c) Operational Restrictions

- (1) The maximum amount of all cleanup material employed in this emissions unit shall not exceed 3.0 gallons per day and 900 gallons per year.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (2) The maximum OC content of the cleanup material employed in this emissions unit shall not exceed 6.6 pounds of OC per gallon of cleanup material.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (3) The permittee shall not employ volatile organic compound (VOC) cleanup materials as VOC is defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5805(b) and Table 4; for cleaning operations	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment*.
63.5805(b) and Table 4; for HAP-containing materials storage	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.
63.5805(b) and Table 4; for mixing activities**	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
63.5805(b) and Table 4; for mixing activities**	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.
63.5805(b) and Table 4; for mixing activities**	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

*The requirements of OAC rule 3745-31-05 restricting the VOC content of cleanup materials may be more stringent than the work practices listed above. The permittee shall comply with the most stringent requirement for cleanup material, as applicable.

**40 CFR 63.5935 defines the HAP-containing material mixing activities subject to Subpart WWWW. 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).

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day this emissions unit is in operation:
- a. the company identification for each coating (resin) and cleanup material employed;
 - b. the number of pounds of each coating employed;
 - c. the OC content (assumed equal to the organic HAP), recorded in percent by weight, of each coating employed in this emissions unit;

- d. the calculated OC/organic HAP emission factor, in pounds of OC/HAP per ton of coating employed, using the information in (c) and the appropriate equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW;
- e. the total OC emissions from all coatings employed, in pounds per day [the summation of (b)/2000 x (d) for all coatings employed];
- f. the total number of hours the emissions unit was in operation;
- g. the average hourly OC emission rate from all coatings, in pounds per hour [(e)/(f)];
- h. the total number of gallons of cleanup material employed;
- i. the OC content of the cleanup material employed, in pounds per gallon;
- j. the OC emissions from the cleanup material employed, in pounds per day [(h) x (i)]; and
- k. a determination whether or not each cleanup material employed is a volatile organic compound (VOC), as defined in OAC rule 3745-21-01.

[Note: The coating information must be for the coatings as employed, including any thinning solvents, additives, and catalysts added at the emissions unit].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-31-05(D), and 40 CFR Part 63 Subpart WWWW]

- (2) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the total number of gallons of cleanup material employed [summation of the information collected in d)(1)h. for all days of the calendar month];
 - b. the total OC emissions from the cleanup material employed, in pounds [summation of the information collected in d)(1)j. for all days of the calendar month];
 - c. the year-to-date total number of gallons of cleanup material employed [summation of the information collected in (a) for all months of the calendar year];
 - d. the year-to-date total OC emissions from the cleanup materials, in tons [summation of the information collected in (b) for all months of the calendar year, divided by 2000 pounds per ton];
 - e. the total OC emissions from all the coatings employed, in tons [summation of d)(1)e. for all days of the calendar month, divided by 2000 pounds per ton]; and



- f. the updated rolling, 12-month summation of OC emissions from all the coatings employed, in tons [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (e)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

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

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

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

63.5810(a)*	data collection and calculation methods for demonstrating compliance with individual resin/gel coat option*
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

*The permittee has elected to utilize the compliance demonstration option in 63.5810(a). Should the permittee choose to demonstrate compliance with the emission limitations listed in b)(2)b. by one of the alternative compliance demonstrations specified in b)(2)c.,



the permittee shall collect and record the information specified in 40 CFR 63.5810(b),(c), or (d), as appropriate. Use of an alternative compliance demonstration method shall be reported pursuant to 63.5910(i).

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

- (5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install 14-05196: d)(1) - d)(4). The monitoring and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. the cleanup material usage restrictions;
 - b. the OC content limitation for the cleanup material;
 - c. the OC emission limitations for the cleanup material;
 - d. the non-VOC restriction for the cleanup material;
 - e. the hourly OC emission limitation for coatings;
 - f. the daily OC emission limitation for coatings; and
 - g. the rolling, 12-month OC emission limitation from all coatings employed.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (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, including 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), (d), (g), and	content of semi-annual compliance reports

(i) and Table 14	
------------------	--

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

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

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

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

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

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

- (5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05196: e)(1) - e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) **Testing Requirements**

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

OC emissions shall not exceed 1.0 pound per hour and 40 pounds per day from coatings (resins).



Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1).

[Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

b. Emission Limitation:

The annual OC emission limitation for all coatings (resins) employed in this emissions unit shall not exceed 1.0 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the combined 12-month rolling OC emission limitation above shall be determined by the record keeping requirements specified in d)(2).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

c. Emission Limitations:

OC emissions shall not exceed 19.8 pounds per day from cleanup materials

OC emissions shall not exceed 2.97 TPY from cleanup materials.

Applicable Compliance Method:

Compliance with the daily and annual OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2). Formulation data or US EPA Method 24 shall be used to determine the OC content of any cleanup material employed in this emissions unit.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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 application method [see b)(2)b. and 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 b)(2)c. of this permit, the record keeping in d)(1) and d)(4), and the compliance methods specified below in f)(2) of this permit.

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

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

63.5797	determination of organic HAP content in resins and gel coats
63.5840 and 63.5860(a)	initial compliance demonstration
63.5895(c)-(d) and 63.5900(a)	continuous compliance demonstrations

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05196: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

10. P037, Tooling Gel Coat

Operations, Property and/or Equipment Description:

Tooling Gel Coat Pump

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05196, issued 7/9/2002)	OC emissions shall not exceed 2.0 pounds per hour and 40 pounds per day from coatings (gel coats). OC emissions shall not exceed 3.3 pounds per day from cleanup materials. OC emissions shall not exceed 0.495 TPY from cleanup materials. PE/PM ₁₀ emissions shall not exceed 0.27 pound per hour. PE/PM ₁₀ emissions shall not exceed 1.38 pounds per day. See c)(1) - c)(3). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) (PTI 14-05196, issued 7/9/2002) Synthetic Minor to Avoid Major New Source Review	See b)(2)a. and c)(4). PE/PM ₁₀ emissions shall not exceed 0.01 TPY, based on a rolling, 12-month summation.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
d.	OAC rule 3745-17-11(C)(3)	The PTI for this emissions unit was issued after January 1, 1990; therefore, the surface coating processes shall comply with the PE limitations established as Best Available Technology (BAT) under OAC rule 3745-31-05(A)(3), rather than the requirements of OAC rule 3745-17-11(C)(1) and (2).
e.	OAC rule 3745-21-25	The requirements of this rule for the control of VOC emissions are equivalent to, or less stringent than, the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions and the requirements established pursuant to OAC rule 3745-31-05 for OC/VOC emissions. Compliance with the emission limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-31-05 will satisfy the requirements of this rule.
f.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)</p> <p>National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production</p> <p>[In accordance with 40 CFR 63.5790, 63.5795, and 63.5935, this emissions unit is an affected source engaged in the following operations: open molding - tooling gel coat application, cleaning of equipment, mixing, and HAP-containing materials storage at an existing reinforced plastic composites production facility subject to emission limits and/or work practice standards specified in this section.]</p>	<p>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 gel coat application.</p> <p>See b)(2)b. for a listing of the specific emission limitations and b)(2)c. for compliance demonstration options.</p> <p>Table 4 to 40 CFR Part 63, Subpart WWWW - Applicable Work Practice Standards. See c)(5).</p>
g.	40 CFR 63.1-15, Subpart A (40 CFR 63.5925)	Table 15 to 40 CFR Part 63, Subpart WWWW - Applicability of General Provisions (Subpart A) to Subpart



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		WWWW shows which parts of the General Provisions in 40 CFR Part 63.1 – 15 apply.

(2) Additional Terms and Conditions

- a. The annual OC emission limitation for all coatings (gel coats) employed in this emissions unit shall not exceed 0.3 TPY, based on a rolling, 12-month summation.

For purposes of clarification of non-attainment new source review (NSR) permitting requirements and this Title V renewal permitting action, the permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC as defined in OAC rule 3745-21-01 shall be employed. The emission of non-VOC based cleanup materials does not count towards the Synthetic Minor Determination to avoid the Emission Offset Policy for VOC established in PTI 14-05196.

- 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 . . .
6. open molding—gel coat ²	a. tooling gel coating	440 lb/ton.

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

²If 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. 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/gel coat compliance demonstration
63.5810(b)	average individual organic HAP emissions limit compliance demonstration for each resin/gel coat type



63.5810(c)	weighted average emission limit compliance demonstration
------------	--

c) Operational Restrictions

- (1) The maximum amount of all cleanup material employed in this emissions unit shall not exceed 0.5 gallon per day and 150 gallons per year.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (2) The maximum OC content of the cleanup material employed in this emissions unit shall not exceed 6.6 pounds of OC per gallon of cleanup material.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

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

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

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (4) The permittee shall not employ volatile organic compound (VOC) cleanup materials as VOC is defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5805(b) and Table 4; for cleaning operations	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment*.
63.5805(b) and Table 4; for HAP-containing materials storage	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.
63.5805(b) and Table 4; for mixing activities**	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
63.5805(b) and Table 4;	Close any mixer vents when actual mixing is occurring,



for mixing activities**	except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety.
63.5805(b) and Table 4; for mixing activities**	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

*The requirements of OAC rule 3745-31-05 restricting the VOC content of cleanup materials may be more stringent than the work practices listed above. The permittee shall comply with the most stringent requirement for cleanup material, as applicable.

**40 CFR 63.5935 defines the HAP-containing material mixing activities subject to Subpart WWWW. 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).

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day this emissions unit is in operation:
 - a. the company identification for each coating (gel coat) and cleanup material employed;
 - b. the number of pounds of each coating employed;
 - c. the OC content (assumed equal to the organic HAP), recorded in percent by weight, of each coating employed in this emissions unit;
 - d. the calculated OC/organic HAP emission factor, in pounds of OC/HAP per ton of coating employed, using the information in (c) and the appropriate equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW;
 - e. the total OC emissions from all coatings employed, in pounds per day [the summation of (b)/2000 x (d) for all coatings employed];
 - f. the total number of hours the emissions unit was in operation;
 - g. the average hourly OC emission rate from all coatings, in pounds per hour [(e)/(f)];
 - h. the total number of gallons of cleanup material employed;
 - i. the OC content of the cleanup material employed, in pounds per gallon;
 - j. the OC emissions from the cleanup material employed, in pounds per day [(h) x (i)];

- k. the total PE/PM₁₀ emissions, in pounds per day [the summation of (b) x (1 - OC/HAP content, percent by weight) x (1 - 0.75, the spray application transfer efficiency) x (1 - 0.985, the control efficiency of the dry filtration system)];
- l. the average hourly PE/PM₁₀ emission rate, in pounds per hour [(k)/(f)]; and
- m. a determination whether or not each cleanup material employed is a volatile organic compound (VOC), as defined in OAC rule 3745-21-01.

[Note: The coating information must be for the coatings as employed, including any thinning solvents, additives, and catalysts added at the emissions unit].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-31-05(D), and 40 CFR Part 63 Subpart WWWW]

- (2) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the total number of gallons of cleanup material employed [summation of the information collected in d)(1)h. for all days of the calendar month];
 - b. the total OC emissions from the cleanup material employed, in pounds [summation of the information collected in d)(1)j. for all days of the calendar month];
 - c. the year-to-date total number of gallons of cleanup material employed [summation of the information collected in (a) for all months of the calendar year];
 - d. the year-to-date total OC emissions from the cleanup materials, in tons [summation of the information collected in (b) for all months of the calendar year, divided by 2000 pounds per ton];
 - e. the total PE/PM₁₀ emissions, in tons [summation of the information collected in d)(1)k. for all days of the calendar month, divided by 2000 pounds per ton];
 - f. the updated rolling, 12-month summation of PE/PM₁₀ emissions, in tons [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (e)];
 - g. the total OC emissions from all the coatings employed, in tons [summation of the information collected in d)(1)e. for all days of the calendar month, divided by 2000 pounds per ton]; and
 - h. the updated rolling, 12-month summation of OC emissions from all the coatings employed, in tons [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (g)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

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

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

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

63.5810(a)*	data collection and calculation methods for demonstrating compliance with individual resin/gel coat option*
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

*The permittee has elected to utilize the compliance demonstration option in 63.5810(a). Should the permittee choose to demonstrate compliance with the emission limitations listed in b)(2)b. by one of the alternative compliance demonstrations specified in b)(2)c., the permittee shall collect and record the information specified in 40 CFR 63.5810(b),(c), or (d), as appropriate. Use of an alternative compliance demonstration method shall be reported pursuant to 63.5910(i).

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

- (5) The permittee shall maintain documentation of the manufacturer’s recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be

maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (10) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install 14-05196: d)(1) - d)(9). The monitoring



and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. the cleanup material usage restrictions;
 - b. the OC content limitation for the cleanup material;
 - c. the OC emission limitations for the cleanup material;
 - d. the non-VOC restriction for the cleanup material;
 - e. the hourly OC emission limitation for coatings;
 - f. the daily OC emission limitation for coatings;
 - g. the hourly PE/PM₁₀ emission limitation;
 - h. the daily PE/PM₁₀ emission limitation;
 - i. the rolling, 12-month PE/PM₁₀ emission limitation;
 - j. the rolling, 12-month OC emission limitation from all the coatings employed; and
 - k. any record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (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, including 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), (d), (g), and (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), (d), (g), and (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

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

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

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

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

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

- (5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05196: e)(1) - e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) **Testing Requirements**

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

OC emissions shall not exceed 2.0 pounds per hour and 40 pounds per day from coatings (gel coats).



Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1).

[Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

b. Emission Limitation:

The annual OC emission limitation for all coatings (gel coats) employed in this emissions unit shall not exceed 0.3 TPY, based on a rolling 12-month summation.

Applicable Compliance Method:

Compliance with the 12-month rolling OC emission limitation above shall be determined by the record keeping requirements specified in d)(2).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

c. Emission Limitations:

OC emissions shall not exceed 3.3 pounds per day from cleanup materials

OC emissions shall not exceed 0.495 TPY from cleanup materials

Applicable Compliance Method:

Compliance with the daily and annual OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2). Formulation data or US EPA Method 24 shall be used to determine the OC content of any cleanup material employed in this emissions unit.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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 gel coating application [see b)(2)b. and 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 b)(2)c. of this permit, the record keeping in d)(1) and d)(4), and the compliance methods specified below in f)(2) of this permit.

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

e. Emission Limitations:

PE/PM₁₀ emissions shall not exceed 0.27 pound per hour; and

PE/PM₁₀ emissions shall not exceed 1.38 pounds per day.

Applicable Compliance Method:

Compliance with the hourly and daily PE/PM₁₀ emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1), which incorporate the spray application transfer efficiency and 98.5% fabric filter design control efficiency as provided by the permittee in the application for PTI 14-05196.

[Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

f. Emission Limitation:

PE/PM₁₀ emissions shall not exceed 0.01 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the 12-month rolling PE/PM₁₀ emission limitation above shall be determined by the record keeping requirements specified in d)(2).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

g. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

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

No Method 9 visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, when appropriate



based upon the results of particulate filter monitoring, recordkeeping, and reporting, Method 9 visible emissions observations will be required pursuant to OAC rule 3745-15-04(A).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A)(1), and 3745-31-05(A)(3)]

- (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
63.5840 and 63.5860(a)	initial compliance demonstration
63.5895(c)-(d) and 63.5900(a)	continuous compliance demonstrations

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05196: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

11. P038, Tooling Spray Chop

Operations, Property and/or Equipment Description:

Tooling Spray Chop

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05196, issued 7/9/2002)	OC emissions shall not exceed 2.0 pounds per hour and 40 pounds per day from coatings (resins). OC emissions shall not exceed 3.3 pounds per day from cleanup materials. OC emissions shall not exceed 0.495 TPY from cleanup materials. PE/PM ₁₀ emissions shall not exceed 0.814 pound per hour. PE/PM ₁₀ emissions shall not exceed 4.07 pounds per day. See c)(1) - c)(3). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) (PTI 14-05196, issued 7/9/2002) Synthetic Minor to Avoid Major New Source Review	See b)(2)a. and c)(4). PE/PM ₁₀ emissions shall not exceed 0.05 TPY, based on a rolling, 12-month summation.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
d.	OAC rule 3745-17-11(C)(3)	The PTI for this emissions unit was issued after January 1, 1990; therefore, the surface coating processes shall comply with the PE limitations established as Best Available Technology (BAT) under OAC rule 3745-31-05(A)(3), rather than the requirements of OAC rule 3745-17-11(C)(1) and (2).
e.	OAC rule 3745-21-25	The requirements of this rule for the control of VOC emissions are equivalent to, or less stringent than, the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions and the requirements established pursuant to OAC rule 3745-31-05 for OC/VOC emissions. Compliance with the emission limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-31-05 will satisfy the requirements of this rule.
f.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)</p> <p>National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production</p> <p>[In accordance with 40 CFR 63.5790, 63.5795, and 63.5935, this emissions unit is an affected source engaged in the following operations: open molding - tooling mechanical resin application, cleaning of equipment, mixing, and HAP-containing materials storage at an existing reinforced plastic composites production facility subject to emission limits and/or work practice standards specified in this section.]</p>	<p>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 method of resin application.</p> <p>See b)(2)b. for a listing of the specific emission limitations and b)(2)c. for compliance demonstration options.</p> <p>Table 4 to 40 CFR Part 63, Subpart WWWW - Applicable Work Practice Standards. See c)(5).</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR 63.1-15, Subpart A (40 CFR 63.5925)	Table 15 to 40 CFR Part 63, Subpart WWWW – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR Part 63.1 – 15 apply.

(2) Additional Terms and Conditions

- a. The annual OC emission limitation for all coatings (resins) employed in this emissions unit shall not exceed 0.5 TPY, based on a rolling, 12-month summation.

For purposes of clarification of non-attainment new source review (NSR) permitting requirements and this Title V renewal permitting action, the permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC as defined in OAC rule 3745-21-01 shall be employed. The emission of non-VOC based cleanup materials does not count towards the Synthetic Minor Determination to avoid the Emission Offset Policy for VOC established in PTI 14-05196.

- 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 . . .
3. open molding—tooling	a. mechanical resin application	254 lb/ton.

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

- c. 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/gel coat compliance demonstration
63.5810(b)	average individual organic HAP emissions limit compliance demonstration for each resin/gel coat type
63.5810(c)	weighted average emission limit compliance demonstration
63.5810(d)	resin and application method compliance demonstration

c) Operational Restrictions

- (1) The maximum amount of all cleanup material employed in this emissions unit shall not exceed 0.5 gallon per day and 150 gallons per year.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (2) The maximum OC content of the cleanup material employed in this emissions unit shall not exceed 6.6 pounds of OC per gallon of cleanup material.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

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

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

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (4) The permittee shall not employ volatile organic compound (VOC) cleanup materials as VOC is defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5805(b) and Table 4; for cleaning operations	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment*.
63.5805(b) and Table 4; for HAP-containing materials storage	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.
63.5805(b) and Table 4; for mixing activities**	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
63.5805(b) and Table 4; for mixing activities**	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.



63.5805(b) and Table 4; for mixing activities**	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
---	--

*The requirements of OAC rule 3745-31-05 restricting the VOC content of cleanup materials may be more stringent than the work practices listed above. The permittee shall comply with the most stringent requirement for cleanup material, as applicable.

**40 CFR 63.5935 defines the HAP-containing material mixing activities subject to Subpart WWWW. 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).

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day this emissions unit is in operation:
 - a. the company identification for each coating (resin) and cleanup material employed;
 - b. the number of pounds of each coating employed;
 - c. the OC content (assumed equal to the organic HAP), recorded in percent by weight, of each coating employed in this emissions unit;
 - d. the calculated OC/organic HAP emission factor, in pounds of OC/HAP per ton of coating employed, using the information in (c) and the appropriate equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW;
 - e. the total OC emissions from all coatings employed, in pounds per day [the summation of (b)/2000 x (d) for all coatings employed];
 - f. the total number of hours the emissions unit was in operation;
 - g. the average hourly OC emission rate from all coatings, in pounds per hour [(e)/(f)];
 - h. the total number of gallons of cleanup material employed;
 - i. the OC content of the cleanup material employed, in pounds per gallon;
 - j. the OC emissions from the cleanup material employed, in pounds per day [(h) x (i)];
 - k. the total PE/PM₁₀ emissions, in pounds per day [the summation of (b) x (1 – OC/HAP content, percent by weight) x (1 - 0.75, the spray application transfer efficiency) x (1 - 0.985, the control efficiency of the dry filtration system)];



- l. the average hourly PE/PM₁₀ emission rate from all coatings, in pounds per hour [(k)/(f)]; and
- m. a determination whether or not each cleanup material employed is a volatile organic compound (VOC), as defined in OAC rule 3745-21-01.

[Note: The coating information must be for the coatings as employed, including any thinning solvents, additives, and catalysts added at the emissions unit].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-31-05(D), and 40 CFR Part 63 Subpart WWWW]

(2) The permittee shall maintain monthly records of the following information for this emissions unit:

- a. the total number of gallons of cleanup material employed [summation of the information collected in d)(1)h. for all days of the calendar month];
- b. the total OC emissions from the cleanup material employed, in pounds [summation of the information collected in d)(1)j. for all days of the calendar month];
- c. the year-to-date total number of gallons of cleanup material employed [summation of the information collected in (a) for all months of the calendar year];
- d. the year-to-date total OC emissions from the cleanup materials, in tons [summation of the information collected in (b) for all months of the calendar year, divided by 2000 pounds per ton];
- e. the total PE/PM₁₀ emissions, in tons [summation of the information collected in d)(1)k. for all days of the calendar month, divided by 2000 pounds per ton];
- f. the updated rolling, 12-month summation of PE/PM₁₀ emissions, in tons [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (e)];
- g. the total OC emissions from all the coatings employed, in tons [summation of the information collected in d)(1)e. for all days of the calendar month, divided by 2000 pounds per ton]; and
- h. the updated rolling, 12-month summation of OC emissions from all the coatings employed, in tons [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (g)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

(3) The permittee shall operate and maintain metering equipment to measure the amount of all coatings (resins/gel coats) used in the emissions unit. The permittee shall calibrate the metering equipment to measure the amount, in weight or volume, of all coatings (resins/gel coats) used in the emissions unit as necessary or appropriate to maintain the accuracy of the measurements guaranteed or specified by the manufacturer of the

metering equipment, or to an accuracy of within plus or minus five percent (5%) of the true value, whichever is more stringent.

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

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

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

63.5810(a)*	data collection and calculation methods for demonstrating compliance with individual resin/gel coat option*
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

*The permittee has elected to utilize the compliance demonstration option in 63.5810(a). Should the permittee choose to demonstrate compliance with the emission limitations listed in b)(2)b. by one of the alternative compliance demonstrations specified in b)(2)c., the permittee shall collect and record the information specified in 40 CFR 63.5810(b),(c), or (d), as appropriate. Use of an alternative compliance demonstration method shall be reported pursuant to 63.5910(i).

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

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

- a. the date of the inspection;
- b. a description of each/any problem identified and the date it was corrected;
- c. a description of any maintenance and repairs performed; and
- d. the name of person who performed the inspection.

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (10) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install 14-05196: d)(1) - d)(9). The monitoring and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
- a. the cleanup material usage restrictions;
 - b. the OC content limitation for the cleanup material;
 - c. the OC emission limitations for the cleanup material;
 - d. the non-VOC restriction for the cleanup material;
 - e. the hourly OC emission limitation for coatings;
 - f. the daily OC emission limitation for coatings;
 - g. the hourly PE/PM₁₀ emission limitation;
 - h. the daily PE/PM₁₀ emission limitation;
 - i. the rolling, 12-month PE/PM₁₀ emission limitation;
 - j. the rolling, 12-month OC emission limitation from all the coatings employed; and
 - k. any record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (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, including 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), (d), (g), and (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), (d), (g), and (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

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

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

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

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

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

- (5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05196: e)(1) - e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) **Testing Requirements**

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

a. **Emission Limitations:**

OC emissions shall not exceed 2.0 pounds per hour and 40 pounds per day from coatings (resins).

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1).

[Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]



b. Emission Limitation:

The annual OC emission limitation for all coatings (resins) employed in this emissions unit shall not exceed 0.5 TPY, based on a rolling 12-month summation.

Applicable Compliance Method:

Compliance with the 12-month rolling OC emission limitation above shall be determined by the record keeping requirements specified in d)(2).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

c. Emission Limitations:

OC emissions shall not exceed 3.3 pounds per day from cleanup materials

OC emissions shall not exceed 0.495 TPY from cleanup materials

Applicable Compliance Method:

Compliance with the daily and annual OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2). Formulation data or US EPA Method 24 shall be used to determine the OC content of any cleanup material employed in this emissions unit.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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 method of resin application [see b)(2)b. and 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 b)(2)c. of this permit, the record keeping in d)(1) and d)(4), and the compliance methods specified below in f)(2) of this permit.

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



e. Emission Limitations:

PE/PM₁₀ emissions shall not exceed 0.814 pound per hour; and

PE/PM₁₀ emissions shall not exceed 4.07 pounds per day.

Applicable Compliance Method:

Compliance with the hourly and daily PE/PM₁₀ emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1), which incorporate the spray application transfer efficiency and 98.5% fabric filter design control efficiency as provided by the permittee in the application for PTI 14-05196.

[Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

f. Emission Limitation:

PE/PM₁₀ emissions shall not exceed 0.05 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the 12-month rolling PE/PM₁₀ emission limitation above shall be determined by the record keeping requirements specified in d)(2).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

g. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

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

No Method 9 visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, when appropriate based upon the results of particulate filter monitoring, recordkeeping, and reporting, Method 9 visible emissions observations will be required pursuant to OAC rule 3745-15-04(A).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A)(1), and 3745-31-05(A)(3)]

- (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
63.5840 and 63.5860(a)	initial compliance demonstration
63.5895(c)-(d) and 63.5900(a)	continuous compliance demonstrations

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05196: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

12. P039, Tooling Layup

Operations, Property and/or Equipment Description:

Tooling Layup

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05196, issued 7/9/2002)	OC emissions shall not exceed 2.0 pounds per hour and 40 pounds per day from coatings (resins). OC emissions shall not exceed 3.3 pounds per day from cleanup materials. OC emissions shall not exceed 0.495 TPY from cleanup materials. See c)(1) and c)(2). Compliance with this rule also includes compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (PTI 14-05196, issued 7/9/2002) Synthetic Minor to Avoid Major New Source Review	See b)(2)a. and c)(3).
c.	OAC rule 3745-21-25	The requirements of this rule for the control of VOC emissions are equivalent to, or less stringent than, the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions and the requirements established pursuant to OAC rule 3745-31-05 for OC/VOC emissions. Compliance with the emission



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-31-05 will satisfy the requirements of this rule.
d.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)</p> <p>National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production</p> <p>[In accordance with 40 CFR 63.5790, 63.5795, and 63.5935, this emissions unit is an affected source engaged in the following operations: open molding tooling using manual resin application, cleaning of equipment, mixing, and HAP-containing materials storage at an existing reinforced plastic composites production facility subject to emission limits and/or work practice standards specified in this section.]</p>	<p>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 using manual resin application.</p> <p>See b)(2)b. for a listing of the specific emission limitations and b)(2)c. for compliance demonstration options.</p> <p>Table 4 to 40 CFR Part 63, Subpart WWWW - Applicable Work Practice Standards. See c)(4).</p>
e.	<p>40 CFR Part 63.1 – 15 (40 CFR 63.5925)</p>	<p>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.</p>

(2) Additional Terms and Conditions

- a. The annual OC emission limitation for all coatings (resins) employed in this emissions unit shall not exceed 0.2 TPY, based on a rolling, 12-month summation.

For purposes of clarification of non-attainment new source review (NSR) permitting requirements and this Title V renewal permitting action, the permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC as defined in OAC rule 3745-21-01 shall be employed. The emission of non-VOC based cleanup materials does not count towards the Synthetic Minor Determination to avoid the Emission Offset Policy for VOC established in PTI 14-05196.



- 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 . . .
3. open molding—tooling	c. manual resin application	157 lb/ton.
5. open molding—shrinkage controlled resins ²	c. manual resin application	180 lb/ton.

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

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

- c. 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/gel coat compliance demonstration
63.5810(b)	average individual organic HAP emissions limit compliance demonstration for each resin/gel coat type
63.5810(c)	weighted average emission limit compliance demonstration
63.5810(d)	resin and application method compliance demonstration

c) Operational Restrictions

- (1) The maximum amount of all cleanup material employed in this emissions unit shall not exceed 0.5 gallon per day and 150 gallons per year.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (2) The maximum OC content of the cleanup material employed in this emissions unit shall not exceed 6.6 pounds of OC per gallon of cleanup material.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (3) The permittee shall not employ volatile organic compound (VOC) cleanup materials as VOC is defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5805(b) and Table 4; for cleaning operations	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment*.
63.5805(b) and Table 4; for HAP-containing materials storage	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.
63.5805(b) and Table 4; for mixing activities**	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
63.5805(b) and Table 4; for mixing activities**	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.
63.5805(b) and Table 4; for mixing activities**	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

*The requirements of OAC rule 3745-31-05 restricting the VOC content of cleanup materials may be more stringent than the work practices listed above. The permittee shall comply with the most stringent requirement for cleanup material, as applicable.

**40 CFR 63.5935 defines the HAP-containing material mixing activities subject to Subpart WWWW. 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).

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

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each day this emissions unit is in operation:
 - a. the company identification for each coating (resin) and cleanup material employed;
 - b. the number of pounds of each coating employed;
 - c. the OC content (assumed equal to the organic HAP), recorded in percent by weight, of each coating employed in this emissions unit;
 - d. the calculated OC/organic HAP emission factor, in pounds of OC/HAP per ton of coating employed, using the information in (c) and the appropriate equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW;

- e. the total OC emissions from all coatings employed, in pounds per day [the summation of (b)/2000 x (d) for all coatings employed];
- f. the total number of hours the emissions unit was in operation;
- g. the average hourly OC emission rate from all coatings, in pounds per hour [(e)/(f)];
- h. the total number of gallons of cleanup material employed;
- i. the OC content of the cleanup material employed, in pounds per gallon;
- j. the OC emissions from the cleanup material employed, in pounds per day [(h) x (i)]; and
- k. a determination whether or not each cleanup material employed is a volatile organic compound (VOC), as defined in OAC rule 3745-21-01.

[Note: The coating information must be for the coatings as employed, including any thinning solvents, additives, and catalysts added at the emissions unit].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-31-05(D), and 40 CFR Part 63 Subpart WWWW]

- (2) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the total number of gallons of cleanup material employed [summation of the information collected in d)(1)h. for all days of the calendar month];
 - b. the total OC emissions from the cleanup material employed, in pounds [summation of the information collected in d)(1)j. for all days of the calendar month];
 - c. the year-to-date total number of gallons of cleanup material employed [summation of the information collected in (a) for all months of the calendar year];
 - d. the year-to-date total OC emissions from the cleanup materials, in tons [summation of the information collected in (b) for all months of the calendar year, divided by 2000 pounds per ton];
 - e. the total OC emissions from all the coatings employed, in tons [summation of d)(1)e. for all days of the calendar month, divided by 2000 pounds per ton]; and
 - f. the updated rolling, 12-month summation of OC emissions from all the coatings employed, in tons [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (e)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

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

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

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

63.5810(a)*	data collection and calculation methods for demonstrating compliance with individual resin/gel coat option*
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

*The permittee has elected to utilize the compliance demonstration option in 63.5810(a). Should the permittee choose to demonstrate compliance with the emission limitations listed in b)(2)b. by one of the alternative compliance demonstrations specified in b)(2)c., the permittee shall collect and record the information specified in 40 CFR 63.5810(b),(c), or (d), as appropriate. Use of an alternative compliance demonstration method shall be reported pursuant to 63.5910(i).

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

- (5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install 14-05196: d)(1) - d)(4). The monitoring and recordkeeping requirements contained in the above-referenced Permit to Install are



subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
- a. the cleanup material usage restrictions;
 - b. the OC content limitation for the cleanup material;
 - c. the OC emission limitations for the cleanup material;
 - d. the non-VOC restriction for the cleanup material;
 - e. the hourly OC emission limitation for coatings;
 - f. the daily OC emission limitation for coatings; and
 - g. the rolling, 12-month OC emission limitation from all coatings employed.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (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, including 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), (d), (g), and (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), (d), (g), and (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

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

- (3) Upon replacement and/or initial operation of any metering or measuring equipment as specified in d)(3) of this permit, the permittee shall provide the Southwest Ohio Air

Quality Agency the following information: the name of the manufacturer of the metering/measuring equipment, the make and model of the metering/measuring equipment, calibration data (e.g., volume of coating per pump stroke), a copy of the manufacturer's specifications and warranty for the accuracy of the metering/measuring equipment and the actual accuracy of the material measurements (by weight or by volume) recorded for the metering/measuring equipment.

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

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

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

- (5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05196: e)(1) - e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) **Testing Requirements**

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

- a. **Emission Limitations:**

OC emissions shall not exceed 2.0 pounds per hour and 40 pounds per day from coatings (resins).

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1).

[Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

- b. **Emission Limitation:**

The annual OC emission limitation for all coatings (resins) employed in this emissions unit shall not exceed 0.2 TPY, based on a rolling, 12-month summation.



Applicable Compliance Method:

Compliance with the combined 12-month rolling OC emission limitation above shall be determined by the record keeping requirements specified in d)(2).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

c. Emission Limitations:

OC emissions shall not exceed 3.3 pounds per day from cleanup materials

OC emissions shall not exceed 0.495 TPY from cleanup materials.

Applicable Compliance Method:

Compliance with the daily and annual OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2). Formulation data or US EPA Method 24 shall be used to determine the OC content of any cleanup material employed in this emissions unit.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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 application method [see b)(2)b. and 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 b)(2)c. of this permit, the record keeping in d)(1) and d)(4), and the compliance methods specified below in f)(2) of this permit.

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

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

63.5797	determination of organic HAP content in resins and gel coats
63.5840 and 63.5860(a)	initial compliance demonstration



Effective Date: To be entered upon final issuance

63.5895(c)-(d) and 63.5900(a)	continuous compliance demonstrations
----------------------------------	--------------------------------------

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05196: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

- g) Miscellaneous Requirements
 - (1) None.



13. Emissions Unit Group - Gel Coat: P026, P029

EU ID	Operations, Property and/or Equipment Description
P026	Service Gel Coat 3 Building B
P029	Service Gel Coat 4 Building B

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05338, issued 10/29/2002)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day from coatings (gel coats). OC emissions shall not exceed 19.8 pounds per day from cleanup materials. OC emissions shall not exceed 2.97 TPY from cleanup materials. PE/PM ₁₀ emissions shall not exceed 0.28 pound per hour. PE/PM ₁₀ emissions shall not exceed 1.38 pounds per day. See c)(1) - c)(3). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1) and 40 CFR Part 63, Subpart WWWW.
b.	OAC rule 3745-31-05(D) (PTI 14-05338, issued 10/29/2002) Synthetic Minor to Avoid Major New	See b)(2)a. and c)(4). For emissions units P026 and P029, individually:



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	Source Review	PE/PM ₁₀ emissions shall not exceed 0.24 TPY, based on a rolling, 12-month summation for each emissions unit.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
d.	OAC rule 3745-17-11(C)(3)	The PTI for these emissions units was issued after January 1, 1990; therefore, the surface coating processes shall comply with the PE limitations established as Best Available Technology (BAT) under OAC rule 3745-31-05(A)(3), rather than the requirements of OAC rule 3745-17-11(C)(1) and (2).
e.	OAC rule 3745-21-25	The requirements of this rule for the control of VOC emissions are equivalent to, or less stringent than, the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions and the requirements established pursuant to OAC rule 3745-31-05 for OC/VOC emissions. Compliance with the emission limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-31-05 will satisfy the requirements of this rule.
f.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)</p> <p>National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production [In accordance with 40 CFR 63.5790, 63.5795, and 63.5935, these emissions units are an affected source engaged in the following operations: open molding gel coat application, cleaning of equipment, mixing, and HAP-containing materials storage at an existing reinforced plastic composites production facility subject to emission limits and/or work practice standards specified in this section.]</p>	<p>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 gel coat application.</p> <p>See b)(2)b. for a listing of the specific emission limitations and b)(2)c. for compliance demonstration options.</p> <p>Table 4 to 40 CFR Part 63, Subpart WWWW - Applicable Work Practice Standards. See c)(5).</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR 63.1-15, Subpart A (40 CFR 63.5925)	Table 15 to 40 CFR Part 63, Subpart WWWW – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR Part 63.1 – 15 apply.

(2) Additional Terms and Conditions

- a. The annual OC emission limitation for the coatings (resins and gel coats) employed in emissions units P026, P029, P040, and P041, combined, shall not exceed 28.0 TPY, based on a rolling, 12-month summation of the coating emissions.

For purposes of clarification of non-attainment new source review (NSR) permitting requirements and this Title V renewal permitting action, the permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC as defined in OAC rule 3745-21-01 shall be employed. The emission of non-VOC based cleanup materials does not count towards the Synthetic Minor Determination to avoid the Emission Offset Policy for VOC established in PTI 14-05338.

- 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 . . .
6. open molding—gel coat ²	a. tooling gel coating	440 lb/ton.
	b. white/off white pigmented gel coating	267 lb/ton.
	c. all other pigmented gel coating	377 lb/ton.
	d. CR/HS or high performance gel coat	605 lb/ton.
	e. fire retardant gel coat	854 lb/ton.
	f. clear production gel coat	522 lb/ton.

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

²If 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. 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/gel coat compliance demonstration
63.5810(b)	average individual organic HAP emissions limit compliance demonstration for each resin/gel coat type
63.5810(c)	weighted average emission limit compliance demonstration

c) Operational Restrictions

- (1) The maximum amount of all cleanup material employed in each emissions unit shall not exceed 3 gallons per day and 900 gallons per year.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (2) The maximum OC content of the cleanup material employed in each emissions unit shall not exceed 6.6 lbs of OC/gallon.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

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

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

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (4) The permittee shall not employ volatile organic compound (VOC) cleanup materials as VOC is defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5805(b) and Table 4; for cleaning operations	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment*.
63.5805(b) and Table 4;	Keep containers that store HAP-containing materials closed

for HAP-containing materials storage	or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
63.5805(b) and Table 4; for mixing activities**	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
63.5805(b) and Table 4; for mixing activities**	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.
63.5805(b) and Table 4; for mixing activities**	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

*The requirements of OAC rule 3745-31-05 restricting the VOC content of cleanup materials may be more stringent than the work practices listed above. The permittee shall comply with the most stringent requirement for cleanup material, as applicable.

**40 CFR 63.5935 defines the HAP-containing material mixing activities subject to Subpart WWWW. 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).

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

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information for each emissions unit each day the emissions unit is in operation:
 - a. the company identification for each coating (gel coat) and cleanup material employed;
 - b. the number of pounds of each coating employed;
 - c. the OC content (assumed equal to the organic HAP), recorded in percent by weight, of each coating employed;
 - d. the calculated OC/organic HAP emission factor, in pounds of OC/HAP per ton of coating employed, using the information in (c) and the appropriate equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW;
 - e. the total OC emissions from all coatings employed, in pounds per day [the summation of (b)/2000 x (d) for all coatings employed];
 - f. the total number of hours the emissions unit was in operation;



- g. the average hourly OC emission rate from all coatings, in pounds per hour [(e)/(f)];
- h. the total number of gallons of cleanup material employed;
- i. the OC content of the cleanup material employed, in pounds per gallon;
- j. the OC emissions from the cleanup material employed, in pounds per day [(h) x (i)];
- k. the total PE/PM₁₀ emissions, in pounds per day [the summation of (b) x (1 - OC/HAP content, percent by weight) x (1 - 0.75, the spray application transfer efficiency) x (1 - 0.985, the control efficiency of the dry filtration system)];
- l. the average hourly PE/PM₁₀ emission rate, in pounds per hour [(k)/(f)]; and
- m. a determination whether or not each cleanup material employed is a volatile organic compound (VOC), as defined in OAC rule 3745-21-01.

[Note: The coating information must be for the coatings as employed, including any thinning solvents, additives, and catalysts added at the emissions unit].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-31-05(D), and 40 CFR Part 63 Subpart WWWW]

- (2) The permittee shall maintain monthly records of the following information for each emissions unit:
 - a. the total number of gallons of cleanup material employed [summation of the information collected in d)(1)h. for all days of the calendar month];
 - b. the total OC emissions from the cleanup material employed, in pounds [summation of the information collected in d)(1)j. for all days of the calendar month];
 - c. the year-to-date total number of gallons of cleanup material employed [summation of the information collected in (a) for all months of the calendar year];
 - d. the year-to-date total OC emissions from the cleanup materials, in tons [summation of the information collected in (b) for all months of the calendar year, divided by 2000 pounds per ton];
 - e. the total PE/PM₁₀ emissions, in tons [summation of the information collected in d)(1)k. for all days of the calendar month, divided by 2000 pounds per ton]; and
 - f. the updated rolling, 12-month summation of PE/PM₁₀ emissions, in tons [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (e)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]



- (3) The permittee shall collect and record the following information for each month for emissions units P026, P029, P040, and P041:
- a. the total OC emissions from all the coatings employed, in tons, for each emissions unit [summation of the daily information collected for each emissions unit for all days of the calendar month, divided by 2000 pounds per ton];
 - b. the total OC emissions from all the coatings employed, in tons, for emissions units P026, P029, P040, and P041, combined [summation of the information collected in (a) for each month of the calendar year]; and
 - c. the updated rolling, 12-month summation of OC emissions from all the coatings employed, in tons, for emissions units P026, P029, P040, and P041, combined [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (b)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

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

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

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

63.5810(a)*	data collection and calculation methods for demonstrating compliance with individual resin/gel coat option*
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

*The permittee has elected to utilize the compliance demonstration option in 63.5810(a). Should the permittee choose to demonstrate compliance with the emission limitations listed in b)(2)b. by one of the alternative compliance demonstrations specified in b)(2)c., the permittee shall collect and record the information specified in 40 CFR 63.5810(b),(c), or (d), as appropriate. Use of an alternative compliance demonstration method shall be reported pursuant to 63.5910(i).

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

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (9) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be

made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (11) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install 14-05338: d)(1) - d)(10). The monitoring and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
- a. the cleanup material usage restrictions;
 - b. the OC content limitation for the cleanup material;
 - c. the OC emission limitations for the cleanup material;
 - d. the non-VOC restriction for the cleanup material;
 - e. the hourly OC emission limitation for coatings;
 - f. the daily OC emission limitation for coatings;
 - g. the hourly PE/PM₁₀ emission limitation;
 - h. the daily PE/PM₁₀ emission limitation;
 - i. the rolling, 12-month PE/PM₁₀ emission limitation;
 - j. the rolling, 12-month OC emission limitation for all coatings employed in emissions units P026, P029, P040, and P041, combined; and



- k. any record showing that the dry particulate filter system was not in service or not operated according to manufacturer’s recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (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, including 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), (d), (g), and (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), (d), (g), and (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

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

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

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

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

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

- (5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to



Install 14-05338: e)(1) - e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitations:

OC emissions shall not exceed 8 pounds per hour and 40 pounds per day from coatings (gel coats).

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1).

[Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

b. Emission Limitation:

The annual OC emission limitation for the coatings (resins and gel coats) employed in emissions units P026, P029, P040, and P041, combined, shall not exceed 28.0 TPY, based on a rolling, 12-month summation of the coating emissions.

Applicable Compliance Method:

Compliance with the combined 12-month rolling OC emission limitation above shall be determined by the record keeping requirements specified in d)(3).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

c. Emission Limitations:

OC emissions shall not exceed 19.8 pounds per day from cleanup materials

OC emissions shall not exceed 2.97 tons per year from cleanup materials

Applicable Compliance Method:

Compliance with the daily and annual OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2). Formulation data or US EPA Method 24 shall be used to



determine the OC content of any cleanup material employed in this emissions unit.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)].

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 gel coating application [see b)(2)b. and 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 b)(2)c. of this permit, the record keeping in d)(1) and d)(5), and the compliance methods specified below in f)(2) of this permit.

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

e. Emission Limitations:

PE/PM₁₀ emissions shall not exceed 0.28 pound per hour; and

PE/PM₁₀ emissions shall not exceed 1.38 pounds per day.

Applicable Compliance Method:

Compliance with the hourly and daily PE/PM₁₀ emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1), which incorporate the spray application transfer efficiency and 98.5% particulate filter design control efficiency as provided by the permittee in the application for PTI 14-05338.

[Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

f. Emission Limitation:

PE/PM₁₀ emissions shall not exceed 0.24 TPY, based on a rolling, 12-month summation for each emissions unit.

Applicable Compliance Method:

Compliance with the 12-month rolling PE/PM₁₀ emission limitation above shall be determined by the record keeping requirements specified in d)(2).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]



g. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

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

No Method 9 visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, when appropriate based upon the results of particulate filter monitoring, recordkeeping, and reporting, Method 9 visible emissions observations will be required pursuant to OAC rule 3745-15-04(A).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A)(1), and 3745-31-05(A)(3)]

- (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
63.5840 and 63.5860(a)	initial compliance demonstration
63.5895(c)-(d) and 63.5900(a)	continuous compliance demonstrations

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05338: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.



14. Emissions Unit Group - Open Molding, Manual: P018, P019

EU ID	Operations, Property and/or Equipment Description
P018	Spray Chop Booth 1
P019	Spray Chop Booth 2

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05196, issued 7/9/2002)	OC emissions shall not exceed 8.0 pounds per hour and 40 pounds per day from coatings (resins). OC emissions shall not exceed 9.9 pounds per day from cleanup materials. OC emissions shall not exceed 1.8 TPY from cleanup materials. PE/PM ₁₀ emissions shall not exceed 0.81 pound per hour. PE/PM ₁₀ emissions shall not exceed 4.1 pounds per day. See c)(1) - c)(3). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) (PTI 14-05196, issued 7/9/2002) Synthetic Minor to Avoid Major New Source Review	See b)(2)a. and c)(4). For emissions units P018 and P019, individually: PE/PM ₁₀ emissions shall not exceed 0.51

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		TPY, based on a rolling, 12-month summation for each emissions unit.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
d.	OAC rule 3745-17-11(C)(3)	The PTI for these emissions units was issued after January 1, 1990; therefore, the surface coating processes shall comply with the PE limitations established as Best Available Technology (BAT) under OAC rule 3745-31-05(A)(3), rather than the requirements of OAC rule 3745-17-11(C)(1) and (2).
e.	OAC rule 3745-21-25	The requirements of this rule for the control of VOC emissions are equivalent to, or less stringent than, the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions and the requirements established pursuant to OAC rule 3745-31-05 for OC/VOC emissions. Compliance with the emission limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-31-05 will satisfy the requirements of this rule.
f.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)</p> <p>National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production [In accordance with 40 CFR 63.5790, 63.5795, and 63.5935, these emissions units are an affected source engaged in the following operations: open molding using mechanical and/or manual resin application, cleaning of equipment, mixing, and HAP-containing materials storage at an existing reinforced plastic composites production facility subject to emission limits and/or work practice standards specified in this section.]</p>	<p>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 method of resin application.</p> <p>See b)(2)b. for a listing of the specific emission limitations and b)(2)c. for compliance demonstration options.</p> <p>Table 4 to 40 CFR Part 63, Subpart WWWW - Applicable Work Practice Standards. See c)(5).</p>



Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR 63.1-15, Subpart A (40 CFR 63.5925)	Table 15 to 40 CFR Part 63, Subpart WWWW – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR Part 63.1 – 15 apply.

(2) Additional Terms and Conditions

- a. The annual OC emission limitation for all coatings (resins and gel coats) employed in emissions units P018, P019, and P020, combined, shall not exceed 15.0 TPY, based on a rolling, 12-month summation.

For purposes of clarification of non-attainment new source review (NSR) permitting requirements and this Title V renewal permitting action, the permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC as defined in OAC rule 3745-21-01 shall be employed. The emission of non-VOC based cleanup materials does not count towards the Synthetic Minor Determination to avoid the Emission Offset Policy for VOC established in PTI 14-05196.

- 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—CR/HS	a. mechanical resin application	113 lb/ton.
	c. manual resin application	123 lb/ton.
2. open molding—non-CR/HS	a. mechanical resin application	88 lb/ton.
	c. manual resin application	87 lb/ton.
3. open molding—tooling	a. mechanical resin application	254 lb/ton.
	c. manual resin application	157 lb/ton.
4. open molding—low-flame spread/low-smoke products	a. mechanical resin application	497 lb/ton.
	c. manual resin application	238 lb/ton.
5. open molding—shrinkage controlled resins ²	a. mechanical resin application	354 lb/ton.
	c. manual resin application	180 lb/ton.

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

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

- c. 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/gel coat compliance demonstration
63.5810(b)	average individual organic HAP emissions limit compliance demonstration for each resin/gel coat type
63.5810(c)	weighted average emission limit compliance demonstration
63.5810(d)	resin and application method compliance demonstration

c) Operational Restrictions

- (1) The maximum amount of all cleanup material employed in each emissions unit shall not exceed 1.5 gallons per day and 550 gallons per year.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (2) The maximum OC content of the cleanup material employed in each emissions unit shall not exceed 6.6 lbs of OC/gallon.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

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

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

[Authority for term: OAC rule 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (4) The permittee shall not employ volatile organic compound (VOC) cleanup materials as VOC is defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5805(b) and Table 4; for cleaning operations	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment*.
63.5805(b) and Table 4; for HAP-containing	Keep containers that store HAP-containing materials closed or covered except during the addition or removal of

materials storage	materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
63.5805(b) and Table 4; for mixing activities**	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
63.5805(b) and Table 4; for mixing activities**	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.
63.5805(b) and Table 4; for mixing activities**	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

*The requirements of OAC rule 3745-31-05 restricting the VOC content of cleanup materials may be more stringent than the work practices listed above. The permittee shall comply with the most stringent requirement for cleanup material, as applicable.

**40 CFR 63.5935 defines the HAP-containing material mixing activities subject to Subpart WWWW. 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).

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each emissions unit each day the emissions unit is in operation:
 - a. the company identification for each coating (resin) and cleanup material employed;
 - b. the number of pounds of each coating employed;
 - c. the OC content (assumed equal to the organic HAP), recorded in percent by weight, of each coating employed;
 - d. the calculated OC/organic HAP emission factor, in pounds of OC/HAP per ton of coating employed, using the information in (c) and the appropriate equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW;
 - e. the total OC emissions from all coatings employed, in pounds per day [the summation of (b)/2000 x (d) for all coatings employed];
 - f. the total number of hours the emissions unit was in operation;
 - g. the average hourly OC emission rate from all coatings, in pounds per hour [(e)/(f)];



- h. the total number of gallons of cleanup material employed;
- i. the OC content of the cleanup material employed, in pounds per gallon;
- j. the OC emissions from the cleanup material employed, in pounds per day [(h) x (i)];
- k. the total PE/PM₁₀ emissions, in pounds per day [the summation of (b) x (1 – OC/HAP content, percent by weight) x (1 - 0.75, the spray application transfer efficiency) x (1 - 0.985, the control efficiency of the dry filtration system)];
- l. the average hourly PE/PM₁₀ emission rate, in pounds per hour [(k)/(f)]; and
- m. a determination whether or not each cleanup material employed is a volatile organic compound (VOC), as defined in OAC rule 3745-21-01.

[Note: The coating information must be for the coatings as employed, including any thinning solvents, additives, and catalysts added at the emissions unit].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-31-05(D), and 40 CFR Part 63 Subpart WWWW]

- (2) The permittee shall maintain monthly records of the following information for each emissions unit:

- a. the total number of gallons of cleanup material employed [summation of the information collected in d)(1)h. for all days of the calendar month];
- b. the total OC emissions from the cleanup material employed, in pounds [summation of the information collected in d)(1)i. for all days of the calendar month];
- c. the year-to-date total number of gallons of cleanup material employed [summation of the information collected in (a) for all months of the calendar year];
- d. the year-to-date total OC emissions from the cleanup materials, in tons [summation of the information collected in (b) for all months of the calendar year, divided by 2000 pounds per ton];
- e. the total PE/PM₁₀ emissions, in tons [summation of the information collected in d)(1)k. for all days of the calendar month, divided by 2000 pounds per ton];
- f. the updated rolling, 12-month summation of PE/PM₁₀ emissions, in tons [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (e)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (3) The permittee shall collect and record the following information for each month for emissions units P018, P019, and P020:



- a. the total OC emissions from all the coatings employed, in tons, for each emissions unit [summation of the daily information collected for each emissions unit for all days of the calendar month, divided by 2000 pounds per ton];
- b. the total OC emissions from all the coatings employed, in tons, for emissions units P018, P019, and P020, combined [summation of the information collected in (a) for each month of the calendar year]; and
- c. the updated rolling, 12-month summation of OC emissions from all the coatings employed, in tons, for emissions units P018, P019, and P020, combined [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (b)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

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

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

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

63.5810(a)*	data collection and calculation methods for demonstrating compliance with individual resin/gel coat option*
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
------------------	--

*The permittee has elected to utilize the compliance demonstration option in 63.5810(a). Should the permittee choose to demonstrate compliance with the emission limitations listed in b)(2)b. by one of the alternative compliance demonstrations specified in b)(2)c., the permittee shall collect and record the information specified in 40 CFR 63.5810(b),(c), or (d), as appropriate. Use of an alternative compliance demonstration method shall be reported pursuant to 63.5910(i).

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

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

- a. the date of the inspection;
- b. a description of each/any problem identified and the date it was corrected;
- c. a description of any maintenance and repairs performed; and
- d. the name of person who performed the inspection.

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (11) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install 14-05196: d)(1) - d)(10). The monitoring and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
- a. the cleanup material usage restrictions;
 - b. the OC content limitation for the cleanup material;
 - c. the OC emission limitations for the cleanup material;
 - d. the non-VOC restriction for the cleanup material;
 - e. the hourly OC emission limitation for coatings;
 - f. the daily OC emission limitation for coatings;
 - g. the hourly PE/PM₁₀ emission limitation;
 - h. the daily PE/PM₁₀ emission limitation;
 - i. the rolling, 12-month PE/PM₁₀ emission limitation;
 - j. the rolling, 12-month OC emission limitation for all coatings employed in emissions units P018, P019, and P020, combined; and
 - k. any record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (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, including 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), (d), (g), and (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), (d), (g), and (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

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

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

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

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

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

- (5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05196: e)(1) - e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitations:

OC emissions shall not exceed 8 pounds per hour and 40 pounds per day from coatings (resins).

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1).

[Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

b. Emission Limitation:

The annual OC emission limitation for all coatings (resins and gel coats) employed in emissions units P018, P019, and P020, combined, shall not exceed 15.0 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the combined 12-month rolling OC emission limitation above shall be determined by the record keeping requirements specified in d)(3).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

c. Emission Limitations:

OC emissions shall not exceed 9.9 pounds per day from cleanup materials

OC emissions shall not exceed 1.8 TPY from cleanup materials.

Applicable Compliance Method:

Compliance with the daily and annual OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2). Formulation data or US EPA Method 24 shall be used to determine the OC content of any cleanup material employed in the emissions unit.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]



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 resin application [see b)(2)b. and 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 b)(2)c. of this permit, the record keeping in d)(1) and d)(5), and the compliance methods specified below in f)(2) of this permit.

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

e. Emission Limitations:

PE/PM₁₀ emissions shall not exceed 0.81 pound per hour; and

PE/PM₁₀ emissions shall not exceed 4.1 pounds per day.

Applicable Compliance Method:

Compliance with the hourly and daily PE/PM₁₀ emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1), which incorporate the spray application transfer efficiency and 98.5% particulate filter design control efficiency as provided by the permittee in the application for PTI 14-05196.

[Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

f. Emission Limitation:

PE/PM₁₀ emissions shall not exceed 0.51 TPY, based on a rolling, 12-month summation for each emissions unit.

Applicable Compliance Method:

Compliance with the 12-month rolling PE/PM₁₀ emission limitation above shall be determined by the record keeping requirements specified in d)(2).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

g. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.



Applicable Compliance Method:

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

No Method 9 visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, when appropriate based upon the results of particulate filter monitoring, recordkeeping, and reporting, Method 9 visible emissions observations will be required pursuant to OAC rule 3745-15-04(A).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A)(1), and 3745-31-05(A)(3)]

- (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
63.5840 and 63.5860(a)	initial compliance demonstration
63.5895(c)-(d) and 63.5900(a)	continuous compliance demonstrations

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05196: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

15. Emissions Unit Group - Open Molding, Mechanical: P023, P024

EU ID	Operations, Property and/or Equipment Description
P023	Robotic Spray Chop Booth 1
P024	Robotic Spray Chop Booth 2

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05223, issued 1/31/2002)	<p>OC emissions shall not exceed 18.5 pounds per hour and 208 pounds per day from coatings (resins).</p> <p>OC emissions shall not exceed 13.2 pounds per day from cleanup materials.</p> <p>OC emissions shall not exceed 1.16 TPY from cleanup materials.</p> <p>PE/PM₁₀ emissions shall not exceed 2.05 pounds per hour.</p> <p>PE/PM₁₀ emissions shall not exceed 22.9 pounds per day.</p> <p>PE/PM₁₀ emissions shall not exceed 2.77 TPY.</p> <p>See c)(1) - c)(8).</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).</p>
b.	OAC rule 3745-31-05(D) (PTI 14-05223, issued 1/31/2002)	See b)(2)a., c)(4), and c)(5).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	Synthetic Minor to Avoid Major New Source Review	
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
d.	OAC rule 3745-17-11(C)(3)	The PTI for these emissions units was issued after January 1, 1990; therefore, the surface coating processes shall comply with the PE limitations established as Best Available Technology (BAT) under OAC rule 3745-31-05(A)(3), rather than the requirements of OAC rule 3745-17-11(C)(1) and (2).
e.	OAC rule 3745-21-25	The requirements of this rule for the control of VOC emissions are equivalent to, or less stringent than, the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions and the requirements established pursuant to OAC rule 3745-31-05 for OC/VOC emissions. Compliance with the emission limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-31-05 will satisfy the requirements of this rule.
f.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)</p> <p>National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production</p> <p>[In accordance with 40 CFR 63.5790, 63.5795, and 63.5935, these emissions units are an affected source engaged in the following operations: open molding using mechanical resin application, cleaning of equipment, mixing, and HAP-containing materials storage at an existing reinforced plastic composites production facility subject to emission limits and/or</p>	<p>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 application.</p> <p>See b)(2)b. for a listing of the specific emission limitations and b)(2)c. for compliance demonstration options.</p> <p>Table 4 to 40 CFR Part 63, Subpart WWWW - Applicable Work Practice Standards. See c)(9).</p>



Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	work practice standards specified in this section.]	
g.	40 CFR 63.1-15, Subpart A (40 CFR 63.5925)	Table 15 to 40 CFR Part 63, Subpart WWWW – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR Part 63.1 – 15 apply.

(2) Additional Terms and Conditions

- a. The annual OC emission limitation for all coatings (resins) employed in each emissions unit shall not exceed 25.0 TPY, based on a rolling 12-month summation.

For purposes of clarification of non-attainment new source review (NSR) permitting requirements and this Title V renewal permitting action, the permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC as defined in OAC rule 3745-21-01 shall be employed. The emission of non-VOC based cleanup materials does not count towards the Synthetic Minor Determination to avoid the Emission Offset Policy for VOC established in PTI 14-05223.

- 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—CR/HS	a. mechanical resin application	113 lb/ton.
2. open molding—non-CR/HS	a. mechanical resin application	88 lb/ton.
3. open molding—tooling	a. mechanical resin application	254 lb/ton.
4. open molding—low-flame spread/low-smoke products	a. mechanical resin application	497 lb/ton.
5. open molding—shrinkage controlled resins ²	a. mechanical resin application	354 lb/ton.

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

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

- c. 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/gel coat compliance demonstration
63.5810(b)	average individual organic HAP emissions limit compliance demonstration for each resin/gel coat type
63.5810(c)	weighted average emission limit compliance demonstration
63.5810(d)	resin and application method compliance demonstration

c) Operational Restrictions

- (1) The maximum amount of all cleanup material employed in each emissions unit shall not exceed 2.0 gallons per day and 350 gallons per year.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (2) The maximum OC content of the cleanup material employed in each emissions unit shall not exceed 6.6 pounds of OC per gallon.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (3) The OC (styrene) content of the coating (resins) shall not exceed the following limitations:

- a. 48%, by weight, as applied for each corrosion resistant material (corrosion resistant materials are polyester resin materials used to make products for corrosion retardant applications such as tooling, fuel or chemical tanks and boat hulls);
- b. 42%, by weight, as applied for each fire retardant material (fire retardant materials are polyester resin materials used to make products resistant to flame or fire); and
- c. 38%, by weight, as applied for all other materials.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (4) The amount of coatings (resins) employed in each emissions unit shall not exceed 840.9 pounds per hour, 9,412 pounds per day and 1,135 tons per year. The tons per year limitation is based upon a rolling, 12-month summation.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (5) The permittee shall not employ volatile organic compound (VOC) cleanup materials as VOC is defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

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

[Authority for term: OAC rule 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (7) The permittee shall electronically monitor the amount of coating pumped by each emissions unit.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (8) The permittee shall only utilize robotic application equipment in each emissions unit.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

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

63.5805(b) and Table 4; for cleaning operations	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment*.
63.5805(b) and Table 4; for HAP-containing materials storage	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.
63.5805(b) and Table 4; for mixing activities**	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
63.5805(b) and Table 4; for mixing activities**	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.
63.5805(b) and Table 4; for mixing activities**	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers



	to the mixing vessels.
--	------------------------

*The requirements of OAC rule 3745-31-05 restricting the VOC content of cleanup materials may be more stringent than the work practices listed above. The permittee shall comply with the most stringent requirement for cleanup material, as applicable.

**40 CFR 63.5935 defines the HAP-containing material mixing activities subject to Subpart WWWW. 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).

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each emissions unit each day the emissions unit is in operation:
 - a. the company identification for each coating (resin) and cleanup material employed, including the type of resin employed (i.e., corrosion resistant, fire retardant, etc);
 - b. the number of pounds of each coating employed;
 - c. the OC content (assumed equal to the organic HAP), recorded in percent by weight, of each coating employed;
 - d. the calculated OC/organic HAP emission factor, in pounds of OC/HAP per ton of coating employed, using the information in (c) and the appropriate equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW;
 - e. the total OC emissions from all coatings employed, in pounds per day [the summation of (b)/2000 x (d) for all coatings employed];
 - f. the total number of hours the emissions unit was in operation;
 - g. the average hourly usage rate for all coatings, in pounds per hour [the summation of (b) for all coatings employed, divided by (f)];
 - h. the average hourly OC emission rate from all coatings, in pounds per hour [(e)/(f)];
 - i. the total number of gallons of cleanup material employed;
 - j. the OC content of the cleanup material employed, in pounds per gallon;
 - k. the OC emissions from the cleanup material employed, in pounds per day [(i) x (j)];

- l. the total PE/PM₁₀ emissions, in pounds per day [the summation of (b) x (1 – OC/HAP content, percent by weight) x (1 - 0.75, the spray application transfer efficiency) x (1 - 0.985, the control efficiency of the dry filtration system)];
- m. the average hourly PE/PM₁₀ emission rate, in pounds per hour [(l)/(f)]; and
- n. a determination whether or not each cleanup material employed is a volatile organic compound (VOC), as defined in OAC rule 3745-21-01.

[Note: The coating information must be for the coatings as employed, including any thinning solvents, additives, and catalysts added at the emissions unit].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-31-05(D), and 40 CFR Part 63 Subpart WWWW]

- (2) The permittee shall maintain monthly records of the following information for each emissions unit:
 - a. the total number of gallons of cleanup material employed [summation of the information collected in d)(1)i. for all days of the calendar month];
 - b. the total OC emissions from the cleanup material employed, in pounds [summation of the information collected in d)(1)k. for all days of the calendar month];
 - c. the year-to-date total number of gallons of cleanup material employed [summation of the information collected in (a) for all months of the calendar year];
 - d. the year-to-date total OC emissions from the cleanup materials, in tons [summation of the information collected in (b) for all months of the calendar year, divided by 2000 pounds per ton];
 - e. the total PE/PM₁₀ emissions, in pounds [summation of the information collected in d)(1)l. for all days of the calendar month];
 - f. the year-to-date total PE/PM₁₀ emissions, in tons [summation of the information collected in (e) for all months of the calendar year, divided by 2000 pounds per ton];
 - g. the total amount of coatings (resins) employed, in pounds [summation of the information collected in d)(1)b. for all days of the calendar month];
 - h. the updated rolling, 12-month summation of the total amount of coatings (resins) employed, in tons [this shall include the total usage for the current month, plus the total for the preceding eleven calendar months from the information collected in (g), divided by 2000 pounds per ton];
 - i. the total OC emissions from all the coatings employed, in pounds [summation of the information collected in d)(1)e. for all days of the calendar month]

- j. the updated rolling, 12-month summation of OC emissions from all the coatings employed, in tons [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (i), divided by 2000 pounds per ton].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

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

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

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

63.5810(a)*	data collection and calculation methods for demonstrating compliance with individual resin/gel coat option*
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

*The permittee has elected to utilize the compliance demonstration option in 63.5810(a). Should the permittee choose to demonstrate compliance with the emission limitations listed in b)(2)b. by one of the alternative compliance demonstrations specified in b)(2)c.,

the permittee shall collect and record the information specified in 40 CFR 63.5810(b),(c), or (d), as appropriate. Use of an alternative compliance demonstration method shall be reported pursuant to 63.5910(i).

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

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (9) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications

made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (10) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install 14-05223: d)(1) - d)(9). The monitoring and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports for each emissions unit that identify all exceedances of the following:
- a. the cleanup material usage restrictions;
 - b. the OC content limitation for the cleanup material;
 - c. the OC emission limitations for the cleanup material;
 - d. the non-VOC restriction for the cleanup material;
 - e. the OC (styrene) content limitation, in percent by weight, for coatings;
 - f. the coating usage restrictions;
 - g. the hourly OC emission limitation for coatings;
 - h. the daily OC emission limitation for coatings;
 - i. the hourly PE/PM₁₀ emission limitation;
 - j. the daily PE/PM₁₀ emission limitation;
 - k. the annual PE/PM₁₀ emission limitation;
 - l. the rolling, 12-month OC emission limitation for all the coatings employed; and
 - m. any record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (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, including 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), (d), (g), and (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), (d), (g), and (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

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

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

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

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

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

- (5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05223: e)(1) - e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitations:

OC emissions shall not exceed 18.5 pounds per hour and 208 pounds per day from coatings (resins).

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1).

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

b. Emission Limitation:

The annual OC emission limitation for all coatings (resins) employed in each emissions unit shall not exceed 25.0 TPY, based on a rolling 12-month summation.

Applicable Compliance Method:

Compliance with the combined 12-month rolling OC emission limitation above shall be determined by the record keeping requirements specified in d)(2).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

c. Emission Limitations:

OC emissions shall not exceed 13.2 pounds per day from cleanup materials; and

OC emissions shall not exceed 1.16 TPY from cleanup materials.

Applicable Compliance Method:

Compliance with the daily and annual OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2). Formulation data or US EPA Method 24 shall be used to determine the OC content of any cleanup material employed in this emissions unit.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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 resin application [see b)(2)b. and 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 b)(2)c. of this permit, the record keeping in d)(1) and d)(4), and the compliance methods specified below in f)(2) of this permit.

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

e. Emission Limitations:

PE/PM₁₀ emissions shall not exceed 2.05 pounds per hour;

PE/PM₁₀ emissions shall not exceed 22.9 pounds per day; and

PE/PM₁₀ emissions shall not exceed 2.77 TPY.

Applicable Compliance Method:

Compliance with the PE/PM₁₀ emission limitations above shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2), which incorporate the spray application transfer efficiency and 98.5% fabric filter design control efficiency as provided by the permittee in the application for PTI 14-05223.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

f. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

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

No Method 9 visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, when appropriate based upon the results of particulate filter monitoring, recordkeeping, and



reporting, Method 9 visible emissions observations will be required pursuant to OAC rule 3745-15-04(A).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A)(1), and 3745-31-05(A)(3)]

- (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
63.5840 and 63.5860(a)	initial compliance demonstration
63.5895(c)-(d) and 63.5900(a)	continuous compliance demonstrations

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05223: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.



16. Emissions Unit Group - Primer Booths, Group 1: R001, R002

EU ID	Operations, Property and/or Equipment Description
R001	Primer Spray Booth 1
R002	Primer Spray Booth 2

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05253, issued 10/24/2002)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day from all coatings. OC emissions shall not exceed 7.0 pounds per day from cleanup materials. PE/PM ₁₀ emissions shall not exceed 0.17 pound per hour*. PE/PM ₁₀ emissions shall not exceed 0.73 TPY*. See c)(1) - c)(5). *The PE/PM ₁₀ emission limitations are based on the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) (PTI 14-05253, issued 10/24/2002)	See b)(2)a. and c)(3) – c)(5).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	Synthetic Minor to Avoid Major New Source Review	
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
d.	OAC rule 3745-17-11(C)(3)	The PTI for these emissions units was issued after January 1, 1990; therefore, the surface coating processes shall comply with the PE limitations established as Best Available Technology (BAT) under OAC rule 3745-31-05(A)(3), rather than the requirements of OAC rule 3745-17-11(C)(1) and (2).

(2) Additional Terms and Conditions

- a. OC emissions from all coatings and cleanup materials employed in each emissions unit shall not exceed 5.0 TPY, based on on a rolling, 12-month summation.

For purposes of clarification of non-attainment new source review (NSR) permitting requirements and this Title V renewal permitting action, the permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC as defined in OAC rule 3745-21-01 shall be employed. The emission of non-VOC based cleanup materials does not count towards the Synthetic Minor Determination to avoid the Emission Offset Policy for VOC established in PTI 14-05253.

c) Operational Restrictions

- (1) The maximum OC content of the cleanup material employed in each emissions unit shall not exceed 7.0 lbs of OC/gallon.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (2) The maximum OC content of each coating employed in each emissions unit shall not exceed 3.0 lbs of OC/gallon, including water and exempt solvents, as applied.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (3) The maximum amount of all cleanup materials employed in each emissions unit shall not exceed 0.936 gallon per day and 220 gallons per year. The gallon per year limitation is based upon a rolling, 12-month summation of the cleanup material usage figures.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (4) The maximum coating usage for each emissions unit shall not exceed 13.3 gallons/day and 2,820 gallons/year. The gallon per year limitation is based upon a rolling, 12-month summation of the coating usage figures.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (5) The permittee shall not employ volatile organic compound (VOC) cleanup materials as VOC is defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

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

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

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information for each emissions unit each day the emissions unit is in operation:

- a. the company identification for each coating and cleanup material employed;
- b. the number of gallons of each coating employed;
- c. the OC content of each coating employed, in pounds per gallon;
- d. the number of gallons of each cleanup material employed;
- e. the OC content of each cleanup material, in pounds per gallon;
- f. the OC emissions for all coatings, in pounds per day [the summation of line (b) x (c) for all coatings employed];
- g. the OC emissions from all cleanup materials employed, in pounds per day [the summation of line (d) x (e) for all cleanup materials employed];
- h. the total number of hours the emissions unit was in operation;
- i. the average hourly OC emission rate for all coatings, in pounds per hour [d)(1)f. / d)(1)h.];
- j. the total number of gallons of all coatings employed per day [summation of (b) for all coatings employed];

- k. the total number of gallons of all cleanup material employed per day [summation of (d) for all cleanup materials]; and
- l. a determination whether or not each cleanup material employed is a volatile organic compound (VOC), as defined in OAC rule 3745-21-01.

[Note: The coating information must be for the coatings as employed, including any thinning solvents, additives, or catalysts added at the emissions unit.]

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (2) The permittee shall maintain monthly records of the following information for each emissions unit:

- a. the total number of gallons of coatings employed during the calendar month [the summation of coating usage in d)(1)j. for all days of the calendar month];
- b. the updated rolling, 12-month summation of all coatings employed, in gallons [this shall include the total usage for the current month in (a), plus the total for the preceding eleven calendar months];
- c. the total number of gallons of cleanup materials employed during the calendar month [the summation cleanup usage in d)(1)k. for all days of the calendar month];
- d. the updated rolling, 12-month summation of all cleanup materials employed, in gallons [this shall include the total usage for the current month in (c), plus the total for the preceding eleven calendar months];
- e. the total OC emissions from all coatings and cleanup materials employed, in tons [the summation of the OC emissions from coatings recorded in d)(1)f. for all days of the calendar month, plus the summation of the OC emissions from cleanup materials recorded in d)(1)g. for all days of the calendar month, divided by 2,000 pounds per ton]; and
- f. the updated rolling, 12-month summation of the OC emissions from all coatings and cleanup materials, in tons [this shall include the total emissions for the current month in (e), plus the total for the preceding eleven calendar months].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

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

- (4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations,

instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

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

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

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

- (6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

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

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

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

- (8) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install 14-05253: d)(1) - d)(7). The monitoring and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. the daily cleanup material usage restriction;
 - b. the daily coating usage restriction;
 - c. the OC content limitation for cleanup materials;
 - d. the non-VOC restriction for the cleanup material;
 - e. the OC content limitation for coatings;
 - f. the hourly OC emission limitation for coatings;
 - g. the daily OC emission limitation for cleanup materials;
 - h. the daily OC emission limitation for coatings;
 - i. the rolling, 12-month OC emission limitation for all coatings and cleanup materials;
 - j. the rolling, 12-month coating usage restriction;
 - k. the rolling, 12-month cleanup material usage restriction; and
 - l. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (2) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05253: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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



a. Emission Limitations:

OC emissions shall not exceed 8 pounds per hour and 40 pounds per day from all coatings.

OC emissions shall not exceed 7.0 pounds per day from cleanup materials employed.

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations from coatings and the daily OC emission limitation from cleanup materials shall be determined by the calculations and record keeping requirements specified in d)(1). Formulation data or US EPA Method 24 shall be used to determine the OC content of any coatings and cleanup materials employed in the emissions unit.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

b. Emission Limitation:

OC emissions from all coatings and cleanup materials employed in each emissions unit shall not exceed 5.0 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the 12-month rolling OC emission limitation above shall be determined by the record keeping requirements specified in d)(2).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

c. Emission Limitations:

PE/PM₁₀ emissions shall not exceed 0.17 pound per hour.

PE/PM₁₀ emissions shall not exceed 0.73 TPY.

Applicable Compliance Method:

The hourly emission limitation above reflects the potential to emit and is based upon the maximum coating application rate, a spray application transfer efficiency of 50%, and the particulate filter design control efficiency of 97% as provided by the permittee in the application for PTI 14-05253.

The annual PE/PM₁₀ emission limitation was determined by multiplying the hourly PE/PM₁₀ emission limitation (0.17 lb/hr) by 8,760 hour/year and dividing by 2,000 lbs/ton. Therefore, compliance with the hourly PE/PM₁₀ emission limitation ensures compliance with the annual PE/PM₁₀ emission limitation.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]



d. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

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

No Method 9 visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, when appropriate based upon the results of particulate filter monitoring, recordkeeping, and reporting, Method 9 visible emissions observations will be required pursuant to OAC rule 3745-15-04(A).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A)(1), and 3745-31-05(A)(3)]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05253: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.



17. Emissions Unit Group - Primer Booths, Group 2: R003, R004

EU ID	Operations, Property and/or Equipment Description
R003	Primer Booth 3
R004	Primer Booth 4

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05253, issued 10/24/2002)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day from all coatings. OC emissions shall not exceed 7.0 pounds per day from cleanup materials. PE/PM ₁₀ emissions shall not exceed 0.17 pound per hour*. PE/PM ₁₀ emissions shall not exceed 0.73 TPY*. See c)(1) - c)(5). *The PE/PM ₁₀ emission limitations are based on the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D) (PTI 14-05253, issued 10/24/2002) Synthetic Minor to Avoid Major New Source Review	See b)(2)a. and c)(3) – c)(5).
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
d.	OAC rule 3745-17-11(C)(3)	The PTI for these emissions units was issued after January 1, 1990; therefore, the surface coating processes shall comply with the PE limitations established as Best Available Technology (BAT) under OAC rule 3745-31-05(A)(3), rather than the requirements of OAC rule 3745-17-11(C)(1) and (2).

(2) Additional Terms and Conditions

- a. OC emissions from all coatings and cleanup materials employed in each emissions unit shall not exceed 7.75 TPY, based on a rolling, 12-month summation.

For purposes of clarification of non-attainment new source review (NSR) permitting requirements and this Title V renewal permitting action, the permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC as defined in OAC rule 3745-21-01 shall be employed. The emission of non-VOC based cleanup materials does not count towards the Synthetic Minor Determination to avoid the Emission Offset Policy for VOC established in PTI 14-05253.

c) Operational Restrictions

- (1) The maximum OC content of the cleanup material employed in each emissions unit shall not exceed 7.0 lbs of OC/gallon.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (2) The maximum OC content of each coating employed in each emissions unit shall not exceed 3.0 lbs of OC/gallon, including water and exempt solvents, as applied.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (3) The maximum amount of all cleanup materials employed in each emissions unit shall not exceed 1.0 gallon per day and 360 gallons per year. The gallon per year limitation is based upon a rolling, 12-month summation of the cleanup material usage figures.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (4) The maximum coating usage for each emissions unit shall not exceed 13.3 gallons/day and 4,326 gallons/year. The gallon per year limitation is based upon a rolling, 12-month summation of the coating usage figures.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (5) The permittee shall not employ volatile organic compound (VOC) cleanup materials as VOC is defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

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

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each emissions unit each day the emissions unit is in operation:
- a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the OC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed;
 - e. the OC content of each cleanup material, in pounds per gallon;
 - f. the OC emissions for all coatings, in pounds per day [the summation of line (b) x (c) for all coatings employed];
 - g. the OC emissions from all cleanup materials employed, in pounds per day [the summation of line (d) x (e) for all cleanup materials employed];
 - h. the total number of hours the emissions unit was in operation;



- i. the average hourly OC emission rate for all coatings, in pounds per hour [d)(1)f. / d)(1)h.];
- j. the total number of gallons of all coatings employed per day [summation of (b) for all coatings employed];
- k. the total number of gallons of all cleanup material employed per day [summation of (d) for all cleanup materials]; and
- l. a determination whether or not each cleanup material employed is a volatile organic compound (VOC), as defined in OAC rule 3745-21-01.

[Note: The coating information must be for the coatings as employed, including any thinning solvents, additives, or catalysts added at the emissions unit.]

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (2) The permittee shall maintain monthly records of the following information for each emissions unit:
 - a. the total number of gallons of coatings employed during the calendar month [the summation of coating usage in d)(1)j. for all days of the calendar month];
 - b. the updated rolling, 12-month summation of all coatings employed, in gallons [this shall include the total usage for the current month in (a), plus the total for the preceding eleven calendar months];
 - c. the total number of gallons of cleanup materials employed during the calendar month [the summation cleanup usage in d)(1)k. for all days of the calendar month];
 - d. the updated rolling, 12-month summation of all cleanup materials employed, in gallons [this shall include the total usage for the current month in (c), plus the total for the preceding eleven calendar months];
 - e. the total OC emissions from all coatings and cleanup materials employed, in tons [the summation of the OC emissions from coatings recorded in d)(1)f. for all days of the calendar month, plus the summation of the OC emissions from cleanup materials recorded in d)(1)g. for all days of the calendar month, divided by 2,000 pounds per ton]; and
 - f. the updated rolling, 12-month summation of the OC emissions from all coatings and cleanup materials, in tons [this shall include the total emissions for the current month in (e), plus the total for the preceding eleven calendar months].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be

maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

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

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

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

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

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

- (6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

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

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

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

- (8) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install 14-05253: d)(1) - d)(7). The monitoring

and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. the daily cleanup material usage restriction;
 - b. the daily coating usage restriction;
 - c. the OC content limitation for cleanup materials;
 - d. the non-VOC restriction for the cleanup material;
 - e. the OC content limitation for coatings;
 - f. the hourly OC emission limitation for coatings;
 - g. the daily OC emission limitation for cleanup materials;
 - h. the daily OC emission limitation for coatings;
 - i. the rolling, 12-month OC emission limitation for all coatings and cleanup materials;
 - j. the rolling, 12-month coating usage restriction;
 - k. the rolling, 12-month cleanup material usage restriction; and
 - l. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (2) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05253: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitations:

OC emissions shall not exceed 8 pounds per hour and 40 pounds per day from all coatings.

OC emissions shall not exceed 7.0 pounds per day from cleanup materials employed.

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations from coatings and the daily OC emission limitation from cleanup materials shall be determined by the calculations and record keeping requirements specified in d)(1). Formulation data or US EPA Method 24 shall be used to determine the OC content of any coatings and cleanup materials employed in the emissions unit.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

b. Emission Limitation:

OC emissions from all coatings and cleanup materials employed in each emissions unit shall not exceed 7.75 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the 12-month rolling OC emission limitation above shall be determined by the record keeping requirements specified in d)(2).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

c. Emission Limitations:

PE/PM₁₀ emissions shall not exceed 0.17 pound per hour.

PE/PM₁₀ emissions shall not exceed 0.73 TPY.

Applicable Compliance Method:

The hourly emission limitation above reflects the potential to emit and is based upon the maximum coating application rate, a spray application transfer efficiency of 50%, and the particulate filter design control efficiency of 97% as provided by the permittee in the application for PTI 14-05253.



The annual PE/PM₁₀ emission limitation was determined by multiplying the hourly PE/PM₁₀ emission limitation (0.17 lb/hr) by 8,760 hour/year and dividing by 2,000 lbs/ton. Therefore, compliance with the hourly PE/PM₁₀ emission limitation ensures compliance with the annual PE/PM₁₀ emission limitation.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

d. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

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

No Method 9 visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, when appropriate based upon the results of particulate filter monitoring, recordkeeping, and reporting, Method 9 visible emissions observations will be required pursuant to OAC rule 3745-15-04(A).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A)(1), and 3745-31-05(A)(3)]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05253: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.



18. Emissions Unit Group - RTM Units, Group 1: P040, P041

EU ID	Operations, Property and/or Equipment Description
P040	RTM Pump 5 Building B
P041	RTM Pump 6 Building B

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05338, issued 10/29/2002)	OC emissions shall not exceed 5.0 pounds per hour and 40 pounds per day from coatings (resins). OC emissions shall not exceed 19.8 pounds per day from cleanup materials. OC emissions shall not exceed 2.97 TPY from cleanup materials. See c)(1) and c)(2). Compliance with this rule also includes compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (PTI 14-05338, issued 10/29/2002) Synthetic Minor to Avoid Major New Source Review	See b)(2)a. and c)(3).
c.	OAC rule 3745-21-25	The requirements of this rule for the control of VOC emissions are equivalent to, or less stringent than, the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions and the requirements established pursuant to



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		OAC rule 3745-31-05 for OC/VOC emissions. Compliance with the emission limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-31-05 will satisfy the requirements of this rule.
d.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 5935)</p> <p>National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production</p> <p>[In accordance with 40 CFR 63.5790, 63.5795, and 63.5935, these emissions units are an affected source engaged in the following operations: closed molding (RTM), cleaning of equipment, mixing, and HAP-containing materials storage at an existing reinforced plastic composites production facility subject to emission limits and/or work practice standards specified in this section.]</p>	Table 4 to 40 CFR Part 63, Subpart WWWW - Applicable Work Practice Standards. See b)(2)b. and c)(4).
e.	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 OC emission limitation, for the coatings (resins and gel coats) employed in emissions units P026, P029, P040, and P041, combined, shall not exceed 28.0 TPY, based on a rolling, 12-month summation of the coating emissions.

For purposes of clarification of non-attainment new source review (NSR) permitting requirements and this Title V renewal permitting action, the permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC as defined in OAC rule 3745-21-01 shall be employed. The emission of non-VOC based cleanup materials does not count towards the Synthetic Minor Determination to avoid the Emission Offset Policy for VOC established in PTI 14-05338.



- b. The closed molding (RTM) associated with the emissions unit is exempt from the requirements in 40 CFR Part 63, Subpart WWWW, pursuant to 63.5790(c). Only the cleaning of equipment, mixing, and HAP-containing material storage activities associated with the emissions unit are subject to requirements (work practice standards) in 40 CFR Part 63, Subpart WWWW, pursuant to 63.5790(b).

c) Operational Restrictions

- (1) The maximum amount of all cleanup material employed in each emissions unit shall not exceed 3.0 gallons per day and 900 gallons per year.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (2) The maximum OC content of the cleanup material employed in each emissions unit shall not exceed 6.6 pounds of OC per gallon of cleanup material.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (3) The permittee shall not employ volatile organic compound (VOC) cleanup materials as VOC is defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5805(b) and Table 4; for cleaning operations	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment*.
63.5805(b) and Table 4; for HAP-containing materials storage	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.
63.5805(b) and Table 4; for mixing activities**	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
63.5805(b) and Table 4; for mixing activities**	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.
63.5805(b) and Table 4; for mixing activities**	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing



	covers to the mixing vessels.
--	-------------------------------

*The requirements of OAC rule 3745-31-05 restricting the VOC content of cleanup materials may be more stringent than the work practices listed above. The permittee shall comply with the most stringent requirement for cleanup material, as applicable.

**40 CFR 63.5935 defines the HAP-containing material mixing activities subject to Subpart WWWW. 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).

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each emissions unit each day the emissions unit is in operation:
 - a. the company identification for each coating (resin) and cleanup material employed;
 - b. the number of pounds of each coating material employed;
 - c. the OC content (assumed equal to the organic HAP), recorded in percent by weight, of each coating employed;
 - d. the total number of gallons of cleanup material employed;
 - e. the OC content of the cleanup material employed, in pounds per gallon;
 - f. the OC emissions from the cleanup material employed, in pounds per day [(d) x (e)];
 - g. the OC emissions from all coatings employed, in pounds per day [the summation of (b) x (c) x 0.03* for all coatings employed];
 - h. the total number of hours the emissions unit was in operation;
 - i. the average hourly OC emission rate from all coatings, in pounds per hour [(g)/(h)]; and
 - j. a determination whether or not each cleanup material employed is a volatile organic compound (VOC), as defined in OAC rule 3745-21-01.

[Note: The coating information must be for the coatings, as employed, including any thinning solvents, additives, or catalysts added at the emissions unit].

*This emission factor represents a worst case 3% evaporation loss from closed molding based upon AP-42, Section 4.4, Table 4.4-2, dated 2/2007.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]



- (2) The permittee shall maintain monthly records of the following information for each emissions unit:
- a. the total number of gallons of cleanup material employed [summation of the information collected in d)(1)d. for all days of the calendar month];
 - b. the total OC emissions from the cleanup material employed, in pounds [summation of the information collected in d)(1)f. for all days of the calendar month];
 - c. the year-to-date total number of gallons of cleanup material employed [summation of the information collected in (a) for all months of the calendar year]; and
 - d. the year-to-date total OC emissions from the cleanup materials, in tons [summation of the information collected in (b) for all months of the calendar year, divided by 2000 pounds per ton].

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (3) The permittee shall collect and record the following information for each month for emissions units P026, P029, P040, and P041:
- a. the total OC emissions from all the coatings employed, in tons, for each emissions unit [summation of the daily information collected for each emissions unit for all days of the calendar month, divided by 2000 pounds per ton];
 - b. the total OC emissions from all the coatings employed, in tons, for emissions units P026, P029, P040, and P041, combined [summation of the information collected in (a) for each month of the calendar year]; and
 - c. the updated rolling, 12-month summation of OC emissions from all the coatings employed, in tons, for emissions units P026, P029, P040, and P041, combined [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (b)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5915(a)	copy of compliance notification(s) and report(s)
63.5915(d) and Table 9	certified statement of compliance with work practice requirements
63.5920(a) – (d)	record keeping format and retention requirements

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

- (5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install 14-05338: d)(1) - d)(4). The monitoring and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. the cleanup material usage restrictions;
 - b. the OC content limitation for the cleanup material;
 - c. the OC emission limitations for the cleanup material;
 - d. the non-VOC restriction for the cleanup material;
 - e. the hourly OC emission limitation for coatings;
 - f. the daily OC emission limitation for coatings; and
 - g. the rolling, 12-month OC emission limitation for all coatings employed in emissions units P026, P029, P040, and P041, combined.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (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, including 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), (d), (g), and (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), (d), (g), and (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.



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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install PTI 14-05338: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

- a. Emission Limitations:

OC emissions shall not exceed 5.0 pounds per hour and 40 pounds per day from coatings (resins).

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1).

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- b. Emission Limitation:

The annual OC emission limitation for the coatings employed in emissions units P026, P029, P040, and P041, combined, shall not exceed 28.0 TPY, based on a rolling, 12-month summation of the coating emissions.

Applicable Compliance Method:

Compliance with the combined 12-month rolling OC emission limitation above shall be determined by the record keeping requirements specified in d)(3).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- c. Emission Limitations:

OC emissions shall not exceed 19.8 pounds per day from cleanup material.

OC emissions shall not exceed 2.97 TPY from cleanup material.



Applicable Compliance Method:

Compliance with the daily and annual OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2). Formulation data or US EPA Method 24 shall be used to determine the OC content of any cleanup material employed in this emissions unit.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

63.5840, 63.5860(a), and Table 9	initial compliance demonstration for work practice standards
63.5900(a)(4)	continuous compliance demonstration for work practice standards

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05338: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

19. Emissions Unit Group - RTM Units, Group 2: P015, P016, P017

EU ID	Operations, Property and/or Equipment Description
P015	Clam Shell Mold 1
P016	Clam Shell Mold 2
P017	Cold Molding 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) (PTI 14-05196, issued 7/9/2002)	OC emissions shall not exceed 2.0 pounds per hour and 40 pounds per day from coatings (resins). OC emissions shall not exceed 19.8 pounds per day from cleanup materials. OC emissions shall not exceed 2.97 TPY from cleanup materials. See c)(1) and c)(2). Compliance with this rule also includes compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (PTI 14-05196, issued 7/9/2002) Synthetic Minor to Avoid Major New Source Review	See b)(2)a. and c)(3).
c.	OAC rule 3745-21-25	The requirements of this rule for the control of VOC emissions are equivalent to, or less stringent than, the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions and the



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		requirements established pursuant to OAC rule 3745-31-05 for OC/VOC emissions. Compliance with the emission limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-31-05 will satisfy the requirements of this rule.
d.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 5935)</p> <p>National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production</p> <p>[In accordance with 40 CFR 63.5790, 63.5795, and 63.5935, these emissions units are an affected source engaged in the following operations: closed molding (RTM), cleaning of equipment, mixing, and HAP-containing materials storage at an existing reinforced plastic composites production facility subject to emission limits and/or work practice standards specified in this section.]</p>	Table 4 to 40 CFR Part 63, Subpart WWWW - Applicable Work Practice Standards. See b)(2)b. and c)(4).
e.	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 OC emission limitation for the coatings (resins) employed in emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined, shall not exceed 20.0 TPY, based on a rolling, 12-month summation of the coating emissions.

For purposes of clarification of non-attainment new source review (NSR) permitting requirements and this Title V renewal permitting action, the permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC as defined in OAC rule 3745-21-01 shall be employed. The emission of non-VOC based cleanup materials does not count towards the Synthetic Minor



Determination to avoid the Emission Offset Policy for VOC established in PTI 14-05196.

- b. The closed molding (RTM) associated with these emissions units is exempt from the requirements in 40 CFR Part 63, Subpart WWWW, pursuant to 63.5790(c). Only the cleaning of equipment, mixing, and HAP-containing material storage activities associated with the emissions unit are subject to requirements (work practice standards) in 40 CFR Part 63, Subpart WWWW, pursuant to 63.5790(b).

c) Operational Restrictions

- (1) The maximum amount of all cleanup material employed in each emissions unit shall not exceed 3.0 gallons per day and 900 gallons per year.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (2) The maximum OC content of the cleanup material employed in each emissions unit shall not exceed 6.6 pounds of OC per gallon of cleanup material.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (3) The permittee shall not employ volatile organic compound (VOC) cleanup materials as VOC is defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5805(b) and Table 4; for cleaning operations	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment*.
63.5805(b) and Table 4; for HAP-containing materials storage	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.
63.5805(b) and Table 4; for mixing activities**	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
63.5805(b) and Table 4; for mixing activities**	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.



63.5805(b) and Table 4; for mixing activities**	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
---	--

*The requirements of OAC rule 3745-31-05 restricting the VOC content of cleanup materials may be more stringent than the work practices listed above. The permittee shall comply with the most stringent requirement for cleanup material, as applicable.

**40 CFR 63.5935 defines the HAP-containing material mixing activities subject to Subpart WWWW. 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).

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each emissions unit each day the emissions unit is in operation:
 - a. the company identification for each coating (resin) and cleanup material employed;
 - b. the number of pounds of each coating employed;
 - c. the OC content (assumed equal to the organic HAP), recorded in percent by weight, of each coating employed;
 - d. the total number of gallons of cleanup material employed;
 - e. the OC content of the cleanup material employed, in pounds per gallon;
 - f. the OC emissions from the cleanup material employed, in pounds per day [(d) x (e)];
 - g. the OC emissions from all coatings employed, in pounds per day [the summation of (b) x (c) x 0.03* for all coatings employed];
 - h. the total number of hours the emissions unit was in operation;
 - i. the average hourly OC emission rate from all coatings, in pounds per hour [(g)/(h)]; and
 - j. a determination whether or not each cleanup material employed is a volatile organic compound (VOC), as defined in OAC rule 3745-21-01.

[Note: The coating information must be for the coatings, as employed, including any thinning solvents, additives, or catalysts added at the emissions unit].



*This emission factor represents a worst case 3% evaporation loss from closed molding based upon AP-42, Section 4.4, Table 4.4-2, dated 2/2007.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (2) The permittee shall maintain monthly records of the following information for each emissions unit:
 - a. the total number of gallons of cleanup material employed [summation of the information collected in d)(1)d. for all days of the calendar month];
 - b. the total OC emissions from the cleanup material employed, in pounds [summation of the information collected in d)(1)f. for all days of the calendar month];
 - c. the year-to-date total number of gallons of cleanup material employed [summation of the information collected in (a) for all months of the calendar year]; and
 - d. the year-to-date total OC emissions from the cleanup materials, in tons [summation of the information collected in (b) for all months of the calendar year, divided by 2000 pounds per ton].

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (3) The permittee shall collect and record the following information for each month for emissions units P006, P013 through P017, P021, P027, P028, P032, and P035:
 - a. the total OC emissions from all the coatings employed, in tons, for each emissions unit [summation of the daily information collected for each emissions unit for all days of the calendar month, divided by 2000 pounds per ton];
 - b. the total OC emissions from all the coatings employed, in tons, for emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined [summation of the information collected in (a) for each month of the calendar year]; and
 - c. the updated rolling, 12-month summation of OC emissions from all the coatings employed, in tons, for emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (b)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5915(a)	copy of compliance notification(s) and report(s)
------------	--



63.5915(d) and Table 9	certified statement of compliance with work practice requirements
63.5920(a) – (d)	record keeping format and retention requirements

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

(5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install 14-05196: d)(1) - d)(4). The monitoring and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
- a. the cleanup material usage restrictions;
 - b. the OC content limitation for the cleanup material;
 - c. the OC emission limitations for the cleanup material;
 - d. the non-VOC restriction for the cleanup material;
 - e. the hourly OC emission limitation for coatings;
 - f. the daily OC emission limitation for coatings; and
 - g. the rolling, 12-month OC emission limitation for all coatings employed in emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

(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, including 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	semi-annual compliance reports



14	
63.5910(c), (d), (g), and (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), (d), (g), and (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05196: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

- a. Emission Limitations:

OC emissions shall not exceed 2.0 pounds per hour and 40 pounds per day from coatings (resins).

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1).

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- b. Emission Limitation:

The annual OC emission limitation for the coatings employed in emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined, shall not exceed 20.0 TPY, based on a rolling, 12-month summation of the coating emissions.

Applicable Compliance Method:

Compliance with the combined 12-month rolling OC emission limitation above shall be determined by the record keeping requirements specified in d)(3).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]



c. Emission Limitations:

OC emissions shall not exceed 19.8 pounds per day from cleanup material.

OC emissions shall not exceed 2.97 TPY from cleanup material.

Applicable Compliance Method:

Compliance with the daily and annual OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2). Formulation data or US EPA Method 24 shall be used to determine the OC content of any cleanup material employed in this emissions unit.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

63.5840, 63.5860(a), and Table 9	initial compliance demonstration for work practice standards
63.5900(a)(4)	continuous compliance demonstration for work practice standards

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05196: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

20. Emissions Unit Group - RTM Units, Group 3: P002, P003, P004

EU ID	Operations, Property and/or Equipment Description
P002	RTM Pump 1 Bldg B
P003	RTM Pump 2 Bldg B
P004	RTM Pump 3 Bldg B

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05196, issued 7/9/2002)	OC emissions shall not exceed 5.0 pounds per hour and 40 pounds per day from coatings (resins). OC emissions shall not exceed 19.8 pounds per day from cleanup materials. OC emissions shall not exceed 2.97 TPY from cleanup materials. See c)(1) and c)(2). Compliance with this rule also includes compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (PTI 14-05196, issued 7/9/2002) Synthetic Minor to Avoid Major New Source Review	See b)(2)a. and c)(3).
c.	OAC rule 3745-21-25	The requirements of this rule for the control of VOC emissions are equivalent to, or less stringent than, the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions and the



Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		requirements established pursuant to OAC rule 3745-31-05 for OC/VOC emissions. Compliance with the emission limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-31-05 will satisfy the requirements of this rule.
d.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 5935)</p> <p>National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production</p> <p>[In accordance with 40 CFR 63.5790, 63.5795, and 63.5935, these emissions units are an affected source engaged in the following operations: closed molding (RTM), cleaning of equipment, mixing, and HAP-containing materials storage at an existing reinforced plastic composites production facility subject to emission limits and/or work practice standards specified in this section.]</p>	Table 4 to 40 CFR Part 63, Subpart WWWW - Applicable Work Practice Standards. See b)(2)b. and c)(4).
e.	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 OC emission limitation for the coatings (resins and gel coats) employed in emissions units P002 through P005, P030, P031, P033 and P034, combined, shall not exceed 25.0 TPY, based on a rolling, 12-month summation of the coating emissions.

For purposes of clarification of non-attainment new source review (NSR) permitting requirements and this Title V renewal permitting action, the permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC as defined in OAC rule 3745-21-01 shall be employed. The emission of non-VOC based cleanup materials does not count towards the Synthetic Minor



Determination to avoid the Emission Offset Policy for VOC established in PTI 14-05196.

- b. The closed molding (RTM) associated with these emissions units is exempt from the requirements in 40 CFR Part 63, Subpart WWWW, pursuant to 63.5790(c). Only the cleaning of equipment, mixing, and HAP-containing material storage activities associated with the emissions unit are subject to requirements (work practice standards) in 40 CFR Part 63, Subpart WWWW, pursuant to 63.5790(b).

c) Operational Restrictions

- (1) The maximum amount of all cleanup material employed in each emissions unit shall not exceed 3.0 gallons per day and 900 gallons per year.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (2) The maximum OC content of the cleanup material employed in each emissions unit shall not exceed 6.6 pounds of OC per gallon of cleanup material.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (3) The permittee shall not employ volatile organic compound (VOC) cleanup materials as VOC is defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5805(b) and Table 4; for cleaning operations	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment*.
63.5805(b) and Table 4; for HAP-containing materials storage	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.
63.5805(b) and Table 4; for mixing activities**	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
63.5805(b) and Table 4; for mixing activities**	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.

63.5805(b) and Table 4; for mixing activities**	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
---	--

*The requirements of OAC rule 3745-31-05 restricting the VOC content of cleanup materials may be more stringent than the work practices listed above. The permittee shall comply with the most stringent requirement for cleanup material, as applicable.

**40 CFR 63.5935 defines the HAP-containing material mixing activities subject to Subpart WWWW. 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).

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each emissions unit each day the emissions unit is in operation:

- a. the company identification for each coating (resin) and cleanup material employed;
- b. the number of pounds of each coating employed;
- c. the OC content (assumed equal to the organic HAP), recorded in percent by weight, of each coating employed;
- d. the total number of gallons of cleanup material employed;
- e. the OC content of the cleanup material employed, in pounds per gallon;
- f. the OC emissions from the cleanup material employed, in pounds per day [(d) x (e)];
- g. the OC emissions from all coatings employed, in pounds per day [the summation of (b) x (c) x 0.03* for all coatings employed];
- h. the total number of hours the emissions unit was in operation;
- i. the average hourly OC emission rate from all coatings, in pounds per hour [(g)/(h)]; and
- j. a determination whether or not each cleanup material employed is a volatile organic compound (VOC), as defined in OAC rule 3745-21-01.

[Note: The coating information must be for the coatings, as employed, including any thinning solvents, additives, or catalysts added at the emissions unit].



*This emission factor represents a worst case 3% evaporation loss from closed molding based upon AP-42, Section 4.4, Table 4.4-2, dated 2/2007.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (2) The permittee shall maintain monthly records of the following information for each emissions unit:
- a. the total number of gallons of cleanup material employed [summation of the information collected in d)(1)d. for all days of the calendar month];
 - b. the total OC emissions from the cleanup material employed, in pounds [summation of the information collected in d)(1)f. for all days of the calendar month];
 - c. the year-to-date total number of gallons of cleanup material employed [summation of the information collected in (a) for all months of the calendar year]; and
 - d. the year-to-date total OC emissions from the cleanup materials, in tons [summation of the information collected in (b) for all months of the calendar year, divided by 2000 pounds per ton].

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (3) The permittee shall collect and record the following information for each month for emissions units P002 through P005, P030, P031, P033 and P034:
- a. the total OC emissions from all the coatings employed, in tons, for each emissions unit [summation of the daily information collected for each emissions unit for all days of the calendar month, divided by 2000 pounds per ton];
 - b. the total OC emissions from all the coatings employed, in tons, for emissions units P002 through P005, P030, P031, P033 and P034, combined [summation of the information collected in (a) for each month of the calendar year]; and
 - c. the updated rolling, 12-month summation of OC emissions from all the coatings employed, in tons, for emissions units P002 through P005, P030, P031, P033 and P034, combined [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (b)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5915(a)	copy of compliance notification(s) and report(s)
63.5915(d) and Table 9	certified statement of compliance with work practice



	requirements
63.5920(a) – (d)	record keeping format and retention requirements

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

- (5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install 14-05196: d)(1) - d)(4). The monitoring and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
- a. the cleanup material usage restrictions;
 - b. the OC content limitation for the cleanup material;
 - c. the OC emission limitations for the cleanup material;
 - d. the non-VOC restriction for the cleanup material;
 - e. the hourly OC emission limitation for coatings;
 - f. the daily OC emission limitation for coatings; and
 - g. the rolling, 12-month OC emission limitation for all coatings employed in emissions units P002 through P005, P030, P031, P033 and P034, combined.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (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, including 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), (d), (g), and (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), (d), (g), and (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05196: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) **Testing Requirements**

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

- a. Emission Limitations:

OC emissions shall not exceed 5.0 pounds per hour and 40 pounds per day from coatings (resins).

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1).

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- b. Emission Limitation:

The annual OC emission limitation for the coatings employed in emissions units P002 through P005, P030, P031, P033 and P034, combined, shall not exceed 25.0 TPY, based on a rolling, 12-month summation of the coating emissions.

Applicable Compliance Method:

Compliance with the combined 12-month rolling OC emission limitation above shall be determined by the record keeping requirements specified in d)(3).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]



c. Emission Limitations:

OC emissions shall not exceed 19.8 pounds per day from cleanup material.

OC emissions shall not exceed 2.97 TPY from cleanup material.

Applicable Compliance Method:

Compliance with the daily and annual OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2). Formulation data or US EPA Method 24 shall be used to determine the OC content of any cleanup material employed in this emissions unit.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

63.5840, 63.5860(a), and Table 9	initial compliance demonstration for work practice standards
63.5900(a)(4)	continuous compliance demonstration for work practice standards

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05196: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.



21. Emissions Unit Group - RTM Units, Group 4: P005, P033, P034

EU ID	Operations, Property and/or Equipment Description
P005	RTM Pump 4 Bldg B
P033	RTM Pump 7 Bldg B
P034	RTM Pump 8 Bldg B

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05196, issued 7/9/2002)	OC emissions shall not exceed 3 pounds per hour and 40 pounds per day from coatings (resins). OC emissions shall not exceed 19.8 pounds per day from cleanup materials. OC emissions shall not exceed 2.97 TPY from cleanup materials. See c)(1) and c)(2). Compliance with this rule also includes compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (PTI 14-05196, issued 7/9/2002) Synthetic Minor to Avoid Major New Source Review	See b)(2)a. and c)(3).
c.	OAC rule 3745-21-25	The requirements of this rule for the control of VOC emissions are equivalent to, or less stringent than, the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions and the



Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		requirements established pursuant to OAC rule 3745-31-05 for OC/VOC emissions. Compliance with the emission limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-31-05 will satisfy the requirements of this rule.
d.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 5935)</p> <p>National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production</p> <p>[In accordance with 40 CFR 63.5790, 63.5795, and 63.5935, these emissions units are an affected source engaged in the following operations: closed molding (RTM), cleaning of equipment, mixing, and HAP-containing materials storage at an existing reinforced plastic composites production facility subject to emission limits and/or work practice standards specified in this section.]</p>	Table 4 to 40 CFR Part 63, Subpart WWWW - Applicable Work Practice Standards. See b)(2)b. and c)(4).
e.	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 OC emission limitation for the coatings (resins and gel coats) employed in emissions units P002 through P005, P030, P031, P033 and P034, combined, shall not exceed 25.0 TPY, based on a rolling, 12-month summation of the coating emissions.

For purposes of clarification of non-attainment new source review (NSR) permitting requirements and this Title V renewal permitting action, the permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC as defined in OAC rule 3745-21-01 shall be employed. The emission of non-VOC based cleanup materials does not count towards the Synthetic Minor



Determination to avoid the Emission Offset Policy for VOC established in PTI 14-05196.

- b. The closed molding (RTM) associated with these emissions units is exempt from the requirements in 40 CFR Part 63, Subpart WWWW, pursuant to 63.5790(c). Only the cleaning of equipment, mixing, and HAP-containing material storage activities associated with this emissions unit are subject to requirements (work practice standards) in 40 CFR Part 63, Subpart WWWW, pursuant to 63.5790(b).

c) Operational Restrictions

- (1) The maximum amount of all cleanup material employed in each emissions unit shall not exceed 3.0 gallons per day and 900 gallons per year.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (2) The maximum OC content of the cleanup material employed in each emissions unit shall not exceed 6.6 pounds of OC per gallon of cleanup material.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (3) The permittee shall not employ volatile organic compound (VOC) cleanup materials as VOC is defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5805(b) and Table 4; for cleaning operations	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment*.
63.5805(b) and Table 4; for HAP-containing materials storage	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.
63.5805(b) and Table 4; for mixing activities**	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
63.5805(b) and Table 4; for mixing activities**	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.



63.5805(b) and Table 4; for mixing activities**	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
---	--

*The requirements of OAC rule 3745-31-05 restricting the VOC content of cleanup materials may be more stringent than the work practices listed above. The permittee shall comply with the most stringent requirement for cleanup material, as applicable.

**40 CFR 63.5935 defines the HAP-containing material mixing activities subject to Subpart WWWW. 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).

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each emissions unit each day the emissions unit is in operation:
 - a. the company identification for each coating (resin) and cleanup material employed;
 - b. the number of pounds of each coating employed;
 - c. the OC content (assumed equal to the organic HAP), recorded in percent by weight, of each coating employed;
 - d. the total number of gallons of cleanup material employed;
 - e. the OC content of the cleanup material employed, in pounds per gallon;
 - f. the OC emissions from the cleanup material employed, in pounds per day [(d) x (e)];
 - g. the OC emissions from all coatings employed, in pounds per day [the summation of (b) x (c) x 0.03* for all coatings employed];
 - h. the total number of hours the emissions unit was in operation;
 - i. the average hourly OC emission rate from all coatings, in pounds per hour [(g)/(h)]; and
 - j. a determination whether or not each cleanup material employed is a volatile organic compound (VOC), as defined in OAC rule 3745-21-01.

[Note: The coating information must be for the coatings, as employed, including any thinning solvents, additives, or catalysts added at the emissions unit].



*This emission factor represents a worst case 3% evaporation loss from closed molding based upon AP-42, Section 4.4, Table 4.4-2, dated 2/2007.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (2) The permittee shall maintain monthly records of the following information for each emissions unit:
- a. the total number of gallons of cleanup material employed [summation of the information collected in d)(1)d. for all days of the calendar month];
 - b. the total OC emissions from the cleanup material employed, in pounds [summation of the information collected in d)(1)f. for all days of the calendar month];
 - c. the year-to-date total number of gallons of cleanup material employed [summation of the information collected in (a) for all months of the calendar year]; and
 - d. the year-to-date total OC emissions from the cleanup materials, in tons [summation of the information collected in (b) for all months of the calendar year, divided by 2000 pounds per ton].

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (3) The permittee shall collect and record the following information for each month for emissions units P002 through P005, P030, P031, P033 and P034:
- a. the total OC emissions from all the coatings employed, in tons, for each emissions unit [summation of the daily information collected for each emissions unit for all days of the calendar month, divided by 2000 pounds per ton];
 - b. the total OC emissions from all the coatings employed, in tons, for emissions units P002 through P005, P030, P031, P033 and P034, combined [summation of the information collected in (a) for each month of the calendar year]; and
 - c. the updated rolling, 12-month summation of OC emissions from all the coatings employed, in tons, for emissions units P002 through P005, P030, P031, P033 and P034, combined [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (b)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5915(a)	copy of compliance notification(s) and report(s)
63.5915(d) and Table 9	certified statement of compliance with work practice



	requirements
63.5920(a) – (d)	record keeping format and retention requirements

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

- (5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install 14-05196: d)(1) - d)(4). The monitoring and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
- a. the cleanup material usage restrictions;
 - b. the OC content limitation for the cleanup material;
 - c. the OC emission limitations for the cleanup material;
 - d. the non-VOC restriction for the cleanup material;
 - e. the hourly OC emission limitation for coatings;
 - f. the daily OC emission limitation for coatings; and
 - g. the rolling, 12-month OC emission limitation for all coatings employed in emissions units P002 through P005, P030, P031, P033 and P034, combined.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (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, including 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), (d), (g), and (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), (d), (g), and (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05196: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) **Testing Requirements**

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

- a. Emission Limitations:

OC emissions shall not exceed 3 pounds per hour and 40 pounds per day from coatings (resins).

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1).

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- b. Emission Limitation:

The annual OC emission limitation for the coatings employed in emissions units P002 through P005, P030, P031, P033 and P034, combined, shall not exceed 25.0 TPY, based on a rolling, 12-month summation of the coating emissions.

Applicable Compliance Method:

Compliance with the combined 12-month rolling OC emission limitation above shall be determined by the record keeping requirements specified in d)(3).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]



c. Emission Limitations:

OC emissions shall not exceed 19.8 pounds per day from cleanup material.

OC emissions shall not exceed 2.97 TPY from cleanup material.

Applicable Compliance Method:

Compliance with the daily and annual OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2). Formulation data or US EPA Method 24 shall be used to determine the OC content of any cleanup material employed in this emissions unit.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

63.5840, 63.5860(a), and Table 9	initial compliance demonstration for work practice standards
63.5900(a)(4)	continuous compliance demonstration for work practice standards

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05196: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

22. Emissions Unit Group - RTM Units, Group 5: P006, P013, P035

EU ID	Operations, Property and/or Equipment Description
P006	RTM Pump 1 Main Bldg
P013	RTM Pump 2 Main Bldg
P035	RTM Pump 8 Main Bldg

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05196, issued 7/9/2002)	OC emissions shall not exceed 5.0 pounds per hour and 40 pounds per day from coatings (resins). OC emissions shall not exceed 19.8 pounds per day from cleanup materials. OC emissions shall not exceed 2.97 TPY from cleanup materials. See c)(1) and c)(2). Compliance with this rule also includes compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (PTI 14-05196, issued 7/9/2002) Synthetic Minor to Avoid Major New Source Review	See b)(2)a. and c)(3).
c.	OAC rule 3745-21-25	The requirements of this rule for the control of VOC emissions are equivalent to, or less stringent than, the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions and the



Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		requirements established pursuant to OAC rule 3745-31-05 for OC/VOC emissions. Compliance with the emission limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-31-05 will satisfy the requirements of this rule.
d.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 5935)</p> <p>National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production</p> <p>[In accordance with 40 CFR 63.5790, 63.5795, and 63.5935, these emissions units are an affected source engaged in the following operations: closed molding (RTM), cleaning of equipment, mixing, and HAP-containing materials storage at an existing reinforced plastic composites production facility subject to emission limits and/or work practice standards specified in this section.]</p>	Table 4 to 40 CFR Part 63, Subpart WWWW - Applicable Work Practice Standards. See b)(2)b. and c)(4).
e.	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 OC emission limitation for the coatings (resins and gel coats) employed in emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined, shall not exceed 20.0 TPY, based on a rolling, 12-month summation of the coating emissions.

For purposes of clarification of non-attainment new source review (NSR) permitting requirements and this Title V renewal permitting action, the permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC as defined in OAC rule 3745-21-01 shall be employed. The emission of non-VOC based cleanup materials does not count towards the Synthetic Minor



Determination to avoid the Emission Offset Policy for VOC established in PTI 14-05196.

- b. The closed molding (RTM) associated with these emissions units is exempt from the requirements in 40 CFR Part 63, Subpart WWWW, pursuant to 63.5790(c). Only the cleaning of equipment, mixing, and HAP-containing material storage activities associated with the emissions unit are subject to requirements (work practice standards) in 40 CFR Part 63, Subpart WWWW, pursuant to 63.5790(b).

c) Operational Restrictions

- (1) The maximum amount of all cleanup material employed in each emissions unit shall not exceed 3.0 gallons per day and 900 gallons per year.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (2) The maximum OC content of the cleanup material employed in each emissions unit shall not exceed 6.6 pounds of OC per gallon of cleanup material.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

- (3) The permittee shall not employ volatile organic compound (VOC) cleanup materials as VOC is defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5805(b) and Table 4; for cleaning operations	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment*.
63.5805(b) and Table 4; for HAP-containing materials storage	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.
63.5805(b) and Table 4; for mixing activities**	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
63.5805(b) and Table 4; for mixing activities**	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.

63.5805(b) and Table 4; for mixing activities**	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
---	--

*The requirements of OAC rule 3745-31-05 restricting the VOC content of cleanup materials may be more stringent than the work practices listed above. The permittee shall comply with the most stringent requirement for cleanup material, as applicable.

**40 CFR 63.5935 defines the HAP-containing material mixing activities subject to Subpart WWWW. 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).

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each emissions unit each day the emissions unit is in operation:

- a. the company identification for each coating (resin) and cleanup material employed;
- b. the number of pounds of each coating employed;
- c. the OC content (assumed equal to the organic HAP), recorded in percent by weight, of each coating employed;
- d. the total number of gallons of cleanup material employed;
- e. the OC content of the cleanup material employed, in pounds per gallon;
- f. the OC emissions from the cleanup material employed, in pounds per day [(d) x (e)];
- g. the OC emissions from all coatings employed, in pounds per day [the summation of (b) x (c) x 0.03* for all coatings employed];
- h. the total number of hours the emissions unit was in operation;
- i. the average hourly OC emission rate from all coatings, in pounds per hour [(g)/(h)]; and
- j. a determination whether or not each cleanup material employed is a volatile organic compound (VOC), as defined in OAC rule 3745-21-01.

[Note: The coating information must be for the coatings, as employed, including any thinning solvents, additives, or catalysts added at the emissions unit].



*This emission factor represents a worst case 3% evaporation loss from closed molding based upon AP-42, Section 4.4, Table 4.4-2, dated 2/2007.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (2) The permittee shall maintain monthly records of the following information for each emissions unit:
 - a. the total number of gallons of cleanup material employed [summation of the information collected in d)(1)d. for all days of the calendar month];
 - b. the total OC emissions from the cleanup material employed, in pounds [summation of the information collected in d)(1)f. for all days of the calendar month];
 - c. the year-to-date total number of gallons of cleanup material employed [summation of the information collected in (a) for all months of the calendar year]; and
 - d. the year-to-date total OC emissions from the cleanup materials, in tons [summation of the information collected in (b) for all months of the calendar year, divided by 2000 pounds per ton].

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (3) The permittee shall collect and record the following information for each month for emissions units P006, P013 through P017, P021, P027, P028, P032, and P035:
 - a. the total OC emissions from all the coatings employed, in tons, for each emissions unit [summation of the daily information collected for each emissions unit for all days of the calendar month, divided by 2000 pounds per ton];
 - b. the total OC emissions from all the coatings employed, in tons, for emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined [summation of the information collected in (a) for each month of the calendar year]; and
 - c. the updated rolling, 12-month summation of OC emissions from all the coatings employed, in tons, for emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (b)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5915(a)	copy of compliance notification(s) and report(s)
------------	--



63.5915(d) and Table 9	certified statement of compliance with work practice requirements
63.5920(a) – (d)	record keeping format and retention requirements

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

(5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install 14-05196: d)(1) - d)(4). The monitoring and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
- a. the cleanup material usage restrictions;
 - b. the OC content limitation for the cleanup material;
 - c. the OC emission limitations for the cleanup material;
 - d. the non-VOC restriction for the cleanup material;
 - e. the hourly OC emission limitation for coatings;
 - f. the daily OC emission limitation for coatings; and
 - g. the rolling, 12-month OC emission limitation for all coatings employed in emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

(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, including 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	semi-annual compliance reports



14	
63.5910(c), (d), (g), and (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), (d), (g), and (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05196: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

- a. Emission Limitations:

OC emissions shall not exceed 5.0 pounds per hour and 40 pounds per day from coatings (resins).

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1).

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- b. Emission Limitation:

The annual OC emission limitation for the coatings employed in emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined, shall not exceed 20.0 TPY, based on a rolling, 12-month summation of the coating emissions.

Applicable Compliance Method:

Compliance with the combined 12-month rolling OC emission limitation above shall be determined by the record keeping requirements specified in d)(3).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]



c. Emission Limitations:

OC emissions shall not exceed 19.8 pounds per day from cleanup material.

OC emissions shall not exceed 2.97 TPY from cleanup material.

Applicable Compliance Method:

Compliance with the daily and annual OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2). Formulation data or US EPA Method 24 shall be used to determine the OC content of any cleanup material employed in this emissions unit.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

63.5840, 63.5860(a), and Table 9	initial compliance demonstration for work practice standards
63.5900(a)(4)	continuous compliance demonstration for work practice standards

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05196: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

23. Emissions Unit Group - RTM Units, Group 6: P021, P032

EU ID	Operations, Property and/or Equipment Description
P021	RTM Pump 7 Main Bldg
P032	RTM Pump 4 Main Bldg

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05196, issued 7/9/2002)	OC emissions shall not exceed 3.0 pounds per hour and 40 pounds per day from coatings (resins). OC emissions shall not exceed 19.8 pounds per day from cleanup materials. OC emissions shall not exceed 2.97 TPY from cleanup materials. See c)(1) and c)(2). Compliance with this rule also includes compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (PTI 14-05196, issued 7/9/2002) Synthetic Minor to Avoid Major New Source Review	See b)(2)a. and c)(3).
c.	OAC rule 3745-21-25	The requirements of this rule for the control of VOC emissions are equivalent to, or less stringent than, the requirements established in 40 CFR Part 63, Subpart WWWW, for the control of organic HAP emissions and the requirements established pursuant to



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		OAC rule 3745-31-05 for OC/VOC emissions. Compliance with the emission limitations and control measures pursuant to 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-31-05 will satisfy the requirements of this rule.
d.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 5935)</p> <p>National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production</p> <p>[In accordance with 40 CFR 63.5790, 63.5795, and 63.5935, these emissions units are an affected source engaged in the following operations: closed molding (RTM), cleaning of equipment, mixing, and HAP-containing materials storage at an existing reinforced plastic composites production facility subject to emission limits and/or work practice standards specified in this section.]</p>	Table 4 to 40 CFR Part 63, Subpart WWWW - Applicable Work Practice Standards. See b)(2)b. and c)(4).
e.	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 OC emission limitation for the coatings (resins) employed in emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined, shall not exceed 20.0 TPY, based on a rolling, 12-month summation of the coating emissions.

For purposes of clarification of non-attainment new source review (NSR) permitting requirements and this Title V renewal permitting action, the permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC as defined in OAC rule 3745-21-01 shall be employed. The emission of non-VOC based cleanup materials does not count towards the Synthetic Minor Determination to avoid the Emission Offset Policy for VOC established in PTI 14-05196.



b. The closed molding (RTM) associated with these emissions units is exempt from the requirements in 40 CFR Part 63, Subpart WWWW, pursuant to 63.5790(c). Only the cleaning of equipment, mixing, and HAP-containing material storage activities associated with this emissions unit are subject to requirements (work practice standards) in 40 CFR Part 63, Subpart WWWW, pursuant to 63.5790(b).

c) Operational Restrictions

(1) The maximum amount of all cleanup material employed in each emissions unit shall not exceed 3.0 gallons per day and 900 gallons per year.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

(2) The maximum OC content of the cleanup material employed in each emissions unit shall not exceed 6.6 pounds of OC per gallon of cleanup material.

[Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3)]

(3) The permittee shall not employ volatile organic compound (VOC) cleanup materials as VOC is defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5805(b) and Table 4; for cleaning operations	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment*.
63.5805(b) and Table 4; for HAP-containing materials storage	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.
63.5805(b) and Table 4; for mixing activities**	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
63.5805(b) and Table 4; for mixing activities**	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.



63.5805(b) and Table 4; for mixing activities**	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
---	--

*The requirements of OAC rule 3745-31-05 restricting the VOC content of cleanup materials may be more stringent than the work practices listed above. The permittee shall comply with the most stringent requirement for cleanup material, as applicable.

**40 CFR 63.5935 defines the HAP-containing material mixing activities subject to Subpart WWWW. 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).

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each emissions unit each day the emissions unit is in operation:
 - a. the company identification for each coating (resin) and cleanup material employed;
 - b. the number of pounds of each coating employed;
 - c. the OC content (assumed equal to the organic HAP), recorded in percent by weight, of each coating employed;
 - d. the total number of gallons of cleanup material employed;
 - e. the OC content of the cleanup material employed, in pounds per gallon;
 - f. the OC emissions from the cleanup material employed, in pounds per day [(d) x (e)];
 - g. the OC emissions from all coatings employed, in pounds per day [the summation of (b) x (c) x 0.03* for all coatings employed];
 - h. the total number of hours the emissions unit was in operation;
 - i. the average hourly OC emission rate from all coatings, in pounds per hour [(g)/(h)]; and
 - j. a determination whether or not each cleanup material employed is a volatile organic compound (VOC), as defined in OAC rule 3745-21-01.

[Note: The coating information must be for the coatings, as employed, including any thinning solvents, additives, or catalysts added at the emissions unit].



*This emission factor represents a worst case 3% evaporation loss from closed molding based upon AP-42, Section 4.4, Table 4.4-2, dated 2/2007.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

- (2) The permittee shall maintain monthly records of the following information for each emissions unit:
 - a. the total number of gallons of cleanup material employed [summation of the information collected in d)(1)d. for all days of the calendar month];
 - b. the total OC emissions from the cleanup material employed, in pounds [summation of the information collected in d)(1)f. for all days of the calendar month];
 - c. the year-to-date total number of gallons of cleanup material employed [summation of the information collected in (a) for all months of the calendar year]; and
 - d. the year-to-date total OC emissions from the cleanup materials, in tons [summation of the information collected in (b) for all months of the calendar year, divided by 2000 pounds per ton].

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- (3) The permittee shall collect and record the following information for each month for emissions units P006, P013 through P017, P021, P027, P028, P032, and P035:
 - a. the total OC emissions from all the coatings employed, in tons, for each emissions unit [summation of the daily information collected for each emissions unit for all days of the calendar month, divided by 2000 pounds per ton];
 - b. the total OC emissions from all the coatings employed, in tons, for emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined [summation of the information collected in (a) for each month of the calendar year]; and
 - c. the updated rolling, 12-month summation of OC emissions from all the coatings employed, in tons, for emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined [this shall include the total for the current month, plus the total for the preceding eleven calendar months from the information collected in (b)].

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

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

63.5915(a)	copy of compliance notification(s) and report(s)
------------	--



63.5915(d) and Table 9	certified statement of compliance with work practice requirements
63.5920(a) – (d)	record keeping format and retention requirements

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

(5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install 14-05196: d)(1) - d)(4). The monitoring and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
- a. the cleanup material usage restrictions;
 - b. the OC content limitation for the cleanup material;
 - c. the OC emission limitations for the cleanup material;
 - d. the non-VOC restriction for the cleanup material;
 - e. the hourly OC emission limitation for coatings;
 - f. the daily OC emission limitation for coatings; and
 - g. the rolling, 12-month OC emission limitation for all coatings employed in emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]

(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, including 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	semi-annual compliance reports

14	
63.5910(c), (d), (g), and (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), (d), (g), and (i) and Table 14 in the quarterly deviation report submitted in accordance with e)(1) above.

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05196: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

- a. Emission Limitations:

OC emissions shall not exceed 3.0 pounds per hour and 40 pounds per day from coatings (resins).

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1).

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- b. Emission Limitation:

The annual OC emission limitation for the coatings employed in emissions units P006, P013 through P017, P021, P027, P028, P032, and P035, combined, shall not exceed 20.0 TPY, based on a rolling, 12-month summation of the coating emissions.

Applicable Compliance Method:

Compliance with the combined 12-month rolling OC emission limitation above shall be determined by the record keeping requirements specified in d)(3).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-31-05(D)]



c. Emission Limitations:

OC emissions shall not exceed 19.8 pounds per day from cleanup material.

OC emissions shall not exceed 2.97 TPY from cleanup material.

Applicable Compliance Method:

Compliance with the daily and annual OC emission limitations shall be determined by the calculations and record keeping requirements specified in d)(1) and d)(2). Formulation data or US EPA Method 24 shall be used to determine the OC content of any cleanup material employed in this emissions unit.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

63.5840, 63.5860(a), and Table 9	initial compliance demonstration for work practice standards
63.5900(a)(4)	continuous compliance demonstration for work practice standards

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

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05196: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.