State of Ohio Environmental Protection Agency

STREET ADDRESS:
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50 W. Town St., Suite 700
Columbus, Ohio 43215

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www.epa.state.oh.us

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

11/26/2008

Certified Mail

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No	NETTING
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No	MODELING SUBMITTED

Jerry Lillie
Hadlock Plastics LLC
110 North Eagle St.
Geneva, OH 44041-1196

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0204030272
Permit Number: P0103962
Permit Type: Initial Installation
County: Ashtabula

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Star Beacon. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.state.oh.us/dapc in Microsoft Word and Adobe Acrobat format. 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
122 South Front Street
Columbus, Ohio 43215

and

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087

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 in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA
Ohio EPA-NEDO; Pennsylvania; Canada

Ashtabula County

PUBLIC NOTICE
Issuance Of Draft Air Pollution Permit-To-Install
Hadlock Plastics LLC

Issue Date: 11/26/2008
Permit Number: P0103962
Permit Type: Initial Installation
Permit Description: new FRP press P013
Facility ID: 0204030272
Facility Location: Hadlock Plastics LLC
110 North Eagle St.,
Geneva, OH 44041-1196
Facility Description: All Other Plastics Product Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Bridget Byrne at Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road or (330)425-9171. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

Air Pollution Permit-to-Install
for
Hadlock Plastics LLC

Facility ID: 0204030272
Permit Number: P0103962
Permit Type: Initial Installation
Issued: 11/26/2008
Effective: To be entered upon final issuance

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install
for
Hadlock Plastics LLC

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Authorization

Facility ID: 0204030272
Facility Description: FRP Manufacturing and Coating
Application Number(s): A0036138
Permit Number: P0103962
Permit Description: new FRP press P013
Permit Type: Initial Installation
Permit Fee: $200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/26/2008
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Hadlock Plastics LLC
110 North Eagle St.
Geneva, OH 44041-1196

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0103962
Permit Description: new FRP press P013

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

Emissions Unit ID:	**P013**
Company Equipment ID:	P013
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 2.a), Severability Clause

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

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

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

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

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

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

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

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

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

2. Severability Clause

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

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

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

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

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

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

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

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

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

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

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

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

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

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

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

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

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted

(i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

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

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

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

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

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

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

14. Public Disclosure

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

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northeast District Office must be notified in writing of any transfer of this permit.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

C. Emissions Unit Terms and Conditions

1. P013, A closed mold FRP press

Operations, Property and/or Equipment Description:

1500 ton hydraulic press

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 operations(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. 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 -31-5(A)(3)	Emissions of volatile organic compounds/ hazardous air pollutants (VOC/HAP) shall not exceed 2167 pounds per month and 13.0 tons per year.
b.	40 CFR Part 63, Subpart WWWW	See b)(2)b.-d. and c)(1).
c.	40 CFR Part 63, Subpart A	See b)(2)a.

(2) Additional Terms and Conditions

a. The permittee is subject to the following requirements specified in 40 CFR Part 63, Subpart A as listed in Table 15 of 40 CFR Part 63, Subpart WWWW:

Parts 63.1 (a)(1)-(4), 63.1(a)(6), 63.1 (a)(10)-(14), 63.1(b)(1), 63.1 (b)(3), 63.1 (c)(1) and (2), 63.1 (c)(5), 63.1 (e), 63.2, 63.3, 63.4, 63.5 (a)(1) and (2), 63.5(b)(1), 63.5(b)(3) and (4), 63.5 (b)(6), 63.5 (d)(1) and (2), 63.5 (d)(4), 63.5 (e)(1) - (5), 63.5 (f)(1) and (2), 63.6 (a)(1) and (2), 63.6 (b)(1)-(5), 63.6 (b)(7), 63.6 (c)(1) and (2), 63.6 (c)(5), 63.6 (e)(1) - (3), 63.6 (f)(2) and (3), 63.6 (g)(1) - (3), 63.6 (i)(1)-(14), 63.6 (i)(16), 63.6 (j), 63.7 (a)(1), 63.7 (a)(3), 63.7 (b)(1) and (2), 63.7 (c), 63.7 (d), 63.7(e), 63.7 (f), 63.7 (g), 63.7 (h), 63.8 (a)(1) and (2), 63.8 (a)(4), 63.8 (b)(1) - (3), 63.8 (c)(1) - (4), 63.8 (c)(6) - (8), 63.8 (d), 63.8 (e)(1) - (4), 63.8 (e)(5)(i), 63.8 (f)(1) - (6), 63.8 (g)(1) - (5), 63.9 (a)(1)-(4), 63.9 (b)(1) and (2), 63.9 (b)(4)(i), 63.9 (b)(4)(v), 63.9 (b)(5), 63.9(c), 63.9 (d), 63.9 (e), 63.9 (g)(1), 63.9 (g)(3), 63.9 (h)(1) - (3), 63.9 (h)(5) and (6), 63.9 (i), 63.9(j), 63.10 (a), 63.10 (b)(1), 63.10 (b)(2)(i) - (xiv), 63.10 (b)(3), 63.10 (c)(1), 63.10 (c)(5) - (8), 63.10 (c)(10) - (15), 63.10 (d)(1) and (2), 63.10 (d)(4) and (5), 63.10 (e)(1) - (3), 63.10 (f), 63.11, 63.12, 63.13, 63.14, and 63.15.

b. The permittee shall comply with the work practice standard to 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. Application equipment includes any equipment that directly contacts resin.

c. The permittee shall comply with the work practice standard to 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.

d. The following operations are specifically excluded from any requirements in 40 CFR Part 63, Subpart WWWW: application of mold sealing and release agents, mold stripping and cleaning, repair of parts not manufactured at this facility, non-gel coat surface coatings, application of putties, polyputties and adhesives, repair of production materials that do not contain resin or gel coat, and research and development operations as defined in section 112(c)(7) of the Clean Air Act.

c) Operational Restrictions

(1) The permittee shall uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds per one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall conduct daily inspections of this emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in c)(1) and shall include the following information:

a. whether the emissions unit was in operation;

b. whether the permittee uncovered, unwrapped or exposed more than one charge per mold cycle per compression/injection molding machine as specified in c)(1); and

c. information on the duration and cause of each deviation and the corrective action taken.

(2) The permittee has demonstrated compliance with the requirements specified in c)(1) if the permittee maintains a certified statement that only one charge is uncovered, unwrapped or exposed per mold cycle per compression/injection molding machine, or prior to the loader, hoppers are closed except when adding materials and materials are recovered after slitting.

(3) The permittee shall collect the following information each month:

a. the identification of each mold compound employed in this emissions unit;

b. the weight of each mold compound employed in this emissions unit, in pounds; and

c. the percent of VOC/HAP, by weight, in each such mold compound.

(4) All applicable records must be maintained in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1). The permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The records may be kept offsite for the remaining 3 years. Records may be kept in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

(5) The permittee must maintain a copy of each notification and report submitted to comply with subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted.

A certified statement of compliance with the work practice requirements must be maintained.

(6) The permittee shall maintain records which identify each HAP in each cleaning solvent employed. If any cleaning solvent contains styrene, the specific application shall also be documented.

(7) The permittee shall maintain records which document any time containers that store HAP containing materials were not kept closed or covered except during the addition or removal of materials. The records shall indicate how long the containers were not properly closed or covered and any actions taken to prevent a reoccurrence.

e) Reporting Requirements

(1) The deviation reports pursuant to the record keeping specified in d)(1) shall be submitted in accordance with the requirements specified in e)(3).

(2) The permittee shall submit deviation (excursion) reports that identify each day when more than 2167 lbs/month VOC/HAP were emitted and the amount of VOC/HAP that was emitted in each such month.

(3) The permittee must submit a semiannual compliance report. Each semiannual compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

Each semiannual compliance report shall be postmarked or delivered no later than January 31 and July 31, whichever date is the first date following the end of the semiannual reporting period.

Each semiannual compliance report must contain the following information:

a. the company name and address;

b. a statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;

c. the date of the report and the beginning and ending dates of the reporting period;

d. if there are no deviations from any work practice standard in this subpart, a statement that there were no deviations from the work practice standards during the reporting period; and

e. for each deviation from the requirements for work practice standards, the compliance report must contain the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

(4) Each affected source that has obtained a Title V operating permit pursuant to 40 CFR Part 70 or 71 must report all deviations as defined in 40 CFR Part 63, Subpart WWWW in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 of 40 CFR Part 63, Subpart WWWW, along with, or as part of, the semiannual monitoring report required by 40 CFR Part 70.6(a)(3)(iii)(A) or 40 CFR Part 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in 40 CFR Part 63, Subpart WWWW, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

(5) If there is a change in any information submitted in any notification, the change must be submitted in writing to the Administrator within 15 calendar days after the change.

f) Testing Requirements

(1) Compliance with the emission limitations in Section b)(1) of these terms and conditions shall be determined in accordance with one of the following methods:

a. Emission Limitation:
2167 lbs VOC/HAP per month

Applicable Compliance Method:
Compliance shall be determined by either i. summing the HAPs emissions for each individual SMC/BMC compound employed in this emissions unit or ii. by calculating the monthly volume-weighted HAP content of all the compounds employed and then calculating the emissions as described below:

i. $$\text{lbs HAP/month} = \sum_{i=1}^{n} (\text{lbs SMC/BMC used/month})\ (\%\text{HAP})\ (\text{EF})$$

Where:
% HAP = % HAP, by weight, employed in the press;
EF = emission factor, which is 2% of the available HAP as documented in Table 5.2 of the background information document for the MACT, or the most recent factor should that factor be updated;
i = subscript denoting a specific SMC/BMC material employed during the month; and

n = total number of SMC/BMC materials employed during the month

or

ii. lbs HAP/month = (lbs SMC/BMC used/month) (monthly volume weighted % HAP) (EF)

Where:

monthly volume weighted % HAP = monthly volume weighted % HAP employed in the press;
EF = emission factor, which is 2% of the available HAP as documented in Table 5.2 of the background information document for the MACT, or the most recent factor should that factor be updated.

b. Emission Limitation:
13.0 tons VOC/HAP per year

Applicable Compliance Method:
Compliance with the annual limit shall be determined by summing the monthly HAP emissions determined in f)(1)a. and multiplying by 1 ton/2000 lbs.

(2) For the work practice standard that the permittee not use cleaning solvents that contain HAP, as detailed in b)(2)b., the permittee has demonstrated compliance if a certified statement is maintained that all cleaning materials, except styrene contained in closed systems, or materials used to clean cured resin from application equipment contain no HAP.

(3) For the work practice standard the permittee keep containers that store HAP-containing materials closed or covered as detailed in b)(2)c., the permittee has demonstrated compliance if a certified statement is maintained that all HAP-containing storage containers are kept closed or covered except when adding or removing materials, and that any bulk storage tanks are vented only as necessary for safety.

g) Miscellaneous Requirements

(1) None.