State of Ohio Environmental Protection Agency

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5/21/2009

Certified Mail
Facility ID: 0370010176
Permit Number: P0087539
County: Richland

Bryan Oswalt
AS America Inc - Am Std Brands
41 Cairns Road
Mansfield, OH 44903

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 4/17/2009. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. 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 permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
Columbus, Ohio 43215

and

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA DAPC, Northwest District Office

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

PRELIMINARY PROPOSED

Air Pollution Title V Permit
for
AS America Inc - Am Std Brands

Facility ID: 0370010176
Permit Number: P0087539
Permit Type: Renewal
Issued: 5/21/2009
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Title V Permit
for
AS America Inc - Am Std Brands

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Authorization

Facility ID: 0370010176
Facility Description: Cultured Marble Manufacturing
Application Number(s): A0018544
Permit Number: P0087539
Permit Description: Renewal Title V Permit for Plastics Plumbing Fixtures
Permit Type: Renewal
Issue Date: 5/21/2009
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0087537

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

AS America Inc - Am Std Brands
41 Cairns Road
Mansfield, OH 44903

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

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

The above named entity is hereby granted a 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 Ohio EPA DAPC, Northwest District Office. 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 (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

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

(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
(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 (i.e., postmarked) 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) constitutes a violation of an emission limitation (or control requirement) and, therefore, 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 scheduled maintenance, 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 promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) 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 (i.e., postmarked) to the appropriate Ohio EPA District Office or local air 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."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northwest District Office.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. 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) 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 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.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition 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 contaminent 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 appropriate Ohio EPA District Office or local air 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 appropriate Ohio EPA District Office or local air 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 (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(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 appropriate Ohio EPA District Office or local air 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 appropriate District Office of the Ohio EPA or local air 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 Fed. Reg. 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 has 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.

No emissions unit 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 opening 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 StateLaw 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 appropriate Ohio EPA District Office or local air 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 appropriate Ohio EPA District Office or local air 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 (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.)

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

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 appropriate Ohio EPA District Office or local air 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 appropriate Ohio EPA District Office or local air 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 (i.e., postmarked) 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 potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

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) 3.

2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emission 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 requirement contained in a permit-to-install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18 and 3745-21 or in 40 CFR, Part 63, Subpart WWWW.

   a) T001 – (3) resin storage tanks; and

   b) T002 – resin storage tank line 2.

   [OAC rule 3745-77-07(A)(13)]

3. The following insignificant emissions units are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

   a) P002 – “Onyx” filler storage bin main line #1

   b) P003 – Calcium carbonate filler storage bin main line #1

   c) P005 – Grinding booth #1 main resin casting line #1

   d) P006 – Grinding booth #1 main resin casting line #2

   e) P007 – Grinding booth custom resin casting line

   f) P011 – Main line refinishing and repair

   g) P012 – Custom line “onyx” bag breaking

   h) P013 – Custom line calcium carbonate bag breaking

   i) P014 – Custom line refinishing and repair

   j) P015 – Main line 2 grinding booth

   k) P016 – Bagbreaking of calcium carbonate main line 2; and

   l) P017 – Bagbreaking of “onyx” main line 2.

4. The following emissions units contained in this permit are subject to 40 CFR, Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production: P001, P004, P010, R001, R002, R003, R004, R005, R010, T001 and T002. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

The permittee shall comply with all applicable requirements of 40 CFR, Part 63, Subpart WWWW. The permittee shall also comply with all applicable requirements of 40 CFR, Part 63, Subpart A (General Provisions) as identified in Table 15 of 40 CFR, Part 63, Subpart WWWW. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart WWWW, and Subpart A.

5. The permittee shall comply with the applicable requirements under 40 CFR, Part 63, Subpart WWWW, including the following sections, for the following insignificant emission units T001 and T002:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.
63.5805(b)	The permittee shall comply with the applicable standards required for existing affected sources pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #3 for new or existing materials HAP-containing material storage operations.
63.5835(a) and (c)	General compliance requirements
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Item #3 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements
63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]
63.5915(a) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept
63.5925	Table 15 of Subpart WWWW of 40 CFR, Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1-15 apply

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

C. Emissions Unit Terms and Conditions

1. P010, Main Resin Automated Casting Line #2

Operations, Property and/or Equipment Description:

Marble Casting for Main Line #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 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 3745-31-05(A)(3) (PTI #03-13262, issued 10/8/02)	5.41 lbs organic compounds (OC)/hr and 14.1 tons OC/yr, from resin materials (for this emissions unit) 874 lbs OC /month and 5.2 tons OC/yr, from cleanup materials [See b)(2)a.] See c)(3) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and 40 CFR, Part 63, Subpart WWWW.
b.	OAC rule 3745-21-07(G)(2)	Exempt, pursuant to OAC rule 3745-21-07(G)(9)(g) [See b)(2)b.] See b)(2)f.
c.	40 CFR, Part 63, Subpart WWWW [40 CFR 63.5780 – 63.5935] [In accordance with 40 CFR 63.5795(a), this emission unit is a new affected source consisting of closed molding operations, mixing, bulk molding compound (BMC) manufacturing operations and cleaning operations at an existing reinforced plastic composites production facility.]	Standards - 40 CFR 63.5805(c) - See b)(2)d. See b)(2)e.,d)(6), e)(4) and f)(3)
d.	40 CFR 63.1 – 15	Table 15 of Subpart WWWW of 40 CFR

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

(2) Additional Terms and Conditions

a. The total OC emissions (from cleanup materials) for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined, shall not exceed 874 lbs OC/month and 5.2 tons OC/yr.

b. In accordance with OAC rule 3745-21-07(G)(9)(g), Best Available Technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).

c. The hourly OC emission limitation of 5.41 pounds was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, it is not necessary to develop monitoring, record keeping, and/or reporting requirements to ensure compliance with this limitation.

d. The permittee shall comply with the applicable standards required for new affected sources pursuant to 40 CFR 63.5805(c). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Items #1, #2, #6, #7 and #8 for closed molding operations, cleaning operations, mixing and BMC manufacturing operations.

e. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.
63.5805(e)	If new or existing facility subject to paragraph (a)(2) or (c) of this section at its initial compliance date that subsequently meets or exceeds the 100 tpy threshold in any calendar year, must notify permitting authority in compliance report. At the same time, you may request a one time exemption from the requirements of paragraph (a)(1) or (d) of this section in the compliance report.
63.5805(f)	If an exemption is applied in paragraph (e) of this section and the HAP emission thresholds specified in paragraph (a)(2) or (c) are subsequently exceeded over the next 12 month-period, must notify the permitting authority in the semiannual report, the exemption is removed and the facility must comply with paragraph (a)(1) or (d) of this section within 3 years from the time the organic HAP emissions first exceed the threshold.

f. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio=s State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)b. and b)(2)b.

c) Operational Restrictions

(1) The maximum monomer content, in weight percent, for the polyester resins employed in this emissions unit shall not exceed the following:

a. pigmented resin used in the veining process -18% (by weight), as applied; and

b. all other polyester resins - 33.5% (by weight), as applied.

[OAC rule 3745-77-07(A)(1) and PTI #03-13262]

(2) The use of any cleanup material containing Hazardous Air Pollutants (HAPs) in this emissions unit, as defined in 112(G) of the Clean Air Act, is prohibited.

[OAC rule 3745-77-07(A)(1) and PTI #03-13262]

(3) The use of any photochemically reactive cleanup material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

[OAC rule 3745-77-07(A)(1) and PTI #03-13262]

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification number of each cleanup material employed;

b. documentation on whether or not each cleanup material employed is a photochemically reactive material; and

c. documentation on whether or not each cleanup material employed contains any HAP.

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

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

a. the name and identification (i.e., pigmented resin used in the veining process or another polyester resin) of each polyester resin material employed; and

b. the monomer content, in weight percent, for each polyester resin material, as applied.

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

(3) The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each polyester resin material employed;

b. the monomer content, in weight percent, for each polyester resin material, as applied;

c. the weight, in pounds, of each polyester resin material employed;

d. the total OC emissions, in pounds, from each polyester resin material employed, calculated by the following equation:

total OC emissions (lbs/month) = b x c x 0.03*

where:

b = weight of each polyester resin material [from section d)(3)c. above]

c = the weight percent of monomer (OC) for each polyester resin material [from section d)(3)b. above]; and

e. the total OC emissions, in pounds, for all the polyester resin materials employed [summation of d)(3)d. for all polyester resin materials].

*OC emission factor from AP-42, Table 4.12-2 (revised 9/88)

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

(4) The permittee shall collect and record the following information each month for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined:

a. the name and identification number of each cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the OC content of each cleanup material employed, in pounds per gallon;

d. the total OC emission rate for each cleanup material employed [d)(4)b. x d)(4)c.], in pounds; and

e. the total OC emission rate for all the cleanup materials employed [summation of d)(4)d. for all cleanup materials, divided by 2000], in tons.

The permittee may calculate the OC emissions from the cleanup materials in accordance with the following formula if waste cleanup materials are sent off site for disposal/reclamation:

OC emissions = summation of [(total gallons of each cleanup material used) x (solvent density of the cleanup material) -(total gallons of each cleanup material

sent off site [minus solids]) x (solvent density of the cleanup material)] for all cleanup materials employed

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

(5) The permittee shall collect and record the following information each year:

a. The total OC emissions for all the polyester resin materials employed in this emissions unit (calculated by summing the monthly OC emission rates, from section d)(3)e., for the calendar year, divided by 2000), in tons.

b. The total OC emissions for all the cleanup materials employed in emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined (calculated by summing the monthly OC emission rates, from section d)(4)e., for the calendar year), in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

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

63.5915(a) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

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

e) Reporting Requirements

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

a. all periods of time during which a photochemically reactive cleanup material was employed;

b. all periods of time during which a cleanup material containing any HAP was employed;

c. all periods of time during which a noncomplying polyester resin material (i.e., for weight percent of monomer) was employed, including the number of pounds of any noncomplying polyester resin material used and the weight fraction of styrene monomer for such material.

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation (from cleanup materials) of 874 pounds (for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined).

All quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

(3) The permittee shall submit annual reports that summarize the actual annual OC emissions (from the polyester resin materials) for this emissions unit and the actual annual OC emissions (from the cleanup materials) for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined). These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A).

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

(4) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

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

f) Testing Requirements

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

a. <u>Emission Limitations:</u> 5.41 lbs OC/hr and 14.1 tons OC/yr

<u>Applicable Compliance Method:</u> The hourly allowable OC emission limitation was established as follows:

i. multiply the maximum resin materials usage rate (lbs/hr) by the maximum allowable monomer content (33.5%, by weight); and

ii. multiply the result from section f)(1)a.i. by an emission factor of 0.03.*

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable OC emission limitation shall be determined pursuant to the recordkeeping requirements established in sections d)(3) and d)(5) of this permit.

*OC emission factor from AP-42, Table 4.12-2 (revised 9/88)

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

b. <u>Emission Limitations:</u> 874 lbs OC/month and 5.2 tons OC/yr, from the use of cleanup materials (for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined)

Applicable Compliance Method: Compliance with the monthly and annual allowable OC emission limitations above shall be determined pursuant to the recordkeeping requirements established in sections d)(4) and d)(5) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

c. Emission Limitation: pigmented resin used in the veining process - 18%, by weight and all other polyester resins - 33.5%, by weight

Applicable Compliance Method: The permittee shall demonstrate compliance with the OC content limitations above through the recordkeeping requirements established in section d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

(2) USEPA Method 24 or Method 311 shall be used to determine the monomer (OC) content of each polyester resin material. Formulation data or USEPA Method 24 shall be used to determine the OC content of each cleanup material.

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

(3) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Items #1, #2, #6, #7 and #8 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

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

g) Miscellaneous Requirements

(1) None.

2. R005, Gelcoat Booth on Custom Resin Line

Operations, Property and/or Equipment Description:

Gelcoat Booth on Custom Resin Line

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 3745-31-05(A)(3) (PTI #03-8793, issued 10/24/02)	6.11 lbs organic compounds (OC)/hr and 15.2 tons OC/yr, from gelcoats (for this emissions unit) 874 lbs OC per month and 5.2 tons OC/yr, from cleanup materials [See b)(2)a.] 0.16 lb particulate emissions (PE)/hr and 0.7 ton PE/yr Visible PE shall not exceed 0 percent opacity, as a six-minute average. See c)(3) The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-17-11(B) and 40 CFR, Part 63, Subpart WWWW.
b.	OAC rule 3745-17-07(A)	See b)(2)b. and b)(2)e.
c.	OAC rule 3745-17-11(B)	See b)(2)b. and b)(2)e.
d.	OAC rule 3745-17-11(C)	See c)(4) and b)(2)f.
e.	OAC rule 3745-21-07(G)(2)	Exempt, pursuant to OAC rule 3745-21-07(G)(9)(g) [See b)(2)c.] See b)(2)k.
f.	40 CFR, Part 63, Subpart WWWW [40 CFR 63.5780 – 63.5935]	Organic HAP Emissions Factors – 40 CFR 63.5796 through 63.5799 – See

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[In accordance with 40 CFR 63.5795(b), this emission unit is an existing affected source consisting of open molding with atomized spray gel coat application and cleaning operations at an existing reinforced plastic composites production facility.]	b)(2)g. Standards – 40 CFR 63.5805(b) – See b)(2)h. See b)(2)i., b)(2)j., d)(6), e)(4) and f)(3)
g.	40 CFR 63.1 – 15 (40 CFR 63.5925)	Table 15 of Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The OC emissions, from cleanup materials, for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined, shall not exceed 874 lbs OC /month and 5.2 tons OC/yr.

b. The limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05.

c. In accordance with OAC rule 3745-21-07(G)(9)(g), best available technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).

d. The hourly OC emission limitation of 6.11 pounds was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, it is not necessary to develop monitoring, record keeping, and/or reporting requirements to ensure compliance with this limitation.

e. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.

f. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling of particulate emissions from surface coating processes. Paragraph (C) of OAC rule 3745-17-11, and c)(4) of this permit for this emissions unit, shall be federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

g. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5796	Organic HAP emissions factor equations in Table 1 of this

	subpart and how they are used in this subpart [See Table 1, Item #1.f of this subpart]
63.5797(a) – (c)	Determination of organic HAP content of resins and gel coats
63.5798(a) and (b)	If use or manufacture an application technology (new or existing) whose organic HAP emissions characteristics are not represented by the equations in Table 1 of this subpart
63.5799(a) – (c)	Calculating facility's organic HAP emissions on a ton per year basis for purposes of determining which paragraphs of 63.5805 apply

h. The permittee shall comply with the applicable standards required for existing affected sources pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the emission limitations stated in Table 3 of 40 CFR, Part 63, Subpart WWWW – Organic HAP Emission Limitations – Item #6 for open molding gel coat operations and the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #2 for cleaning operations.

i. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.

j. The permittee shall comply with the standards for this emission unit by using the following compliance option:

63.5810	Options for meeting the standards for open molding operations at new or existing sources

k. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio=s State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)e. and b)(2)c.

c) Operational Restrictions

(1) The maximum monomer content, in weight percent, as applied, for the gelcoats employed in this emissions unit shall not exceed the following:

a. clear gelcoats - 44%, by weight; and

b. all other gelcoats - 30%, by weight.

[OAC rule 3745-77-07(A)(1) and PTI #03-8793]

(2) The use of any cleanup material containing Hazardous Air Pollutants (HAPs) in this emissions unit, as defined in 112(G) of the Clean Air Act, is prohibited.

[OAC rule 3745-77-07(A)(1) and PTI #03-8793]

(3) The use of any photochemically reactive cleanup material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

[OAC rule 3745-77-07(A)(1) and PTI #03-8793]

(4) The spray coating operation for this emissions unit shall be controlled by a dry particulate filter. The permittee shall follow all of these work practices:

a. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry filtration system with any modifications deemed necessary by the permittee during the time period in which the dry filtrations system is utilized.

b. The permittee shall operate the dry filtration system in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.

c. The permittee shall conduct periodic inspections of the dry filtration system to determine whether the device is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry filtration system while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.

d. The permittee shall document each inspection of the dry filtration system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.

e. In the event that the dry filtration system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control device is not operating in accordance with such requirements.

Any documentation required under c)(4)a. shall be maintained for not less than five years, and shall be made available to Ohio EPA upon request.

[OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification number of each cleanup material employed;

b. documentation on whether or not each cleanup material employed is a photochemically reactive material; and

c. documentation on whether or not each cleanup material employed contains any HAP.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

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

a. the name and identification (i.e., clear gelcoat or another gelcoat) of each gelcoat employed; and

b. the monomer content, in weight percent, for each gelcoat, as applied.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

(3) The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each gelcoat employed;

b. the weight fraction of monomer, in percent OC (by weight), for each gelcoat, as applied;

c. the weight, in pounds, of each gelcoat employed

d. the total OC emissions, in pounds, for each gelcoat employed, calculated using the following equation:

Total OC emissions (lbs/month) = W x 0.68 x [(1.036 x P) - .195]*

Where:

W = weight, in pounds of each gelcoat

P = the weight fraction of monomer, in percent OC, for each gelcoat, as applied; and

e. the total OC emissions, in pounds, for all the gelcoats employed [summation of d)(3)d. for all gelcoats].

*based on Equation 7, Page 13, "CFA Emission Models for the Reinforced Plastics Industries," February 28, 1998

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

(4) The permittee shall collect and record the following information each month for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined:

a. the name and identification number of each cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the OC content of each cleanup material employed, in pounds per gallon;

d. the total OC emission rate for each cleanup material employed [d)(4)b. x d)(4)c.], in pounds; and

e. the total OC emission rate for all the cleanup materials employed [summation of d)(4)d. for all cleanup materials, divided by 2000], in tons.

The permittee may calculate the OC emissions from the cleanup materials in accordance with the following formula if waste cleanup materials are sent off site for disposal/reclamation:

OC emissions = summation of [(total gallons of each cleanup material used) x (solvent density of the cleanup material) -(total gallons of each cleanup material sent off site {minus solids}] x (solvent density of the cleanup material)] for all cleanup materials employed

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

(5) The permittee shall collect and record the following information each year:

a. The total OC emissions for all the gelcoats employed in this emissions unit (calculated by summing the monthly OC emission rates, from section d)(3)e., for the calendar year, divided by 2000), in tons.

b. The total OC emissions for all the cleanup materials employed in emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined (calculated by summing the monthly OC emission rates, from section d)(4)e., for the calendar year), in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

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

63.5895(c) and (d)	How to monitor and collect data to demonstrate continuous compliance
63.5915(a), (c) and (d)	Records that must be kept

53.5920(a) – (d)	In what form and for how long records must be kept

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

e) Reporting Requirements

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

a. all periods of time during which a photochemically reactive cleanup material was employed;

b. all periods of time during which a cleanup material containing any HAP was employed;

c. all periods of time during which a noncomplying gelcoat (i.e., for weight percent of monomer) was employed, including the number of pounds of any noncomplying gelcoat used and the weight fraction of styrene monomer for such material.

All quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation (from cleanup materials) of 874 pounds (for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined).

All quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

(3) The permittee shall submit annual reports that summarize the actual annual OC emissions (from the gelcoats) for this emissions unit, and the actual annual OC emissions (from the cleanup materials) for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined. These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A).

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

(4) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

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

f) Testing Requirements

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

a. Emission Limitations: 6.11 lbs OC/hr, from gelcoats (for this emissions unit) and 15.2 tons OC/yr, from gelcoats (for this emissions unit)

Applicable Compliance Method: The hourly allowable OC emission limitation was established as follows:

allowable OC emissions (lbs/hr) = {W x 0.68 x [(1.036 x P) - .195]}*

Where:

W = the maximum gelcoats usage rate (lbs/hr)

P = the maximum allowable monomer content (44%, by weight)

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable OC emission limitation shall be determined pursuant to the recordkeeping requirements established in sections d)(3) and d)(5) of this permit.

* based on Equation 7, Page 13, "CFA Emission Models for the Reinforced Plastics Industries," February 28, 1998

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

b. Emission Limitations: 874 lbs OC/month and 5.2 tons OC/yr, from the use of cleanup materials (for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined)

Applicable Compliance Method: Compliance with the monthly and annual allowable OC emission limitations above shall be determined pursuant to the recordkeeping requirements established in sections d)(4) and d)(5) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

c. Emission Limitations: 0.16 lb PE/hr and 0.7 ton PE/yr

Applicable Compliance Method: To determine the actual worst case PE rate (E), the following equation may be used for the paint spraying operation:

E = PE rate (lbs/hr)

E = maximum coating solids usage, in pounds per hour x (1-TE)(1-CE) where

TE = transfer efficiency, which is the ration of the amount of coating solids deposited on the coated part to the amount of coating solids used (assumed to be 62.5%)

CE = control efficiency of the control equipment (assumed to be 98%)

If required, the permittee shall demonstrate compliance with the above emissions limit in accordance with Methods 1 - 5, 40 CFR, Part 60 Appendix A.

The tons of PE/yr limitation was developed by multiplying the lb/hr limitation by 8760, and then dividing by 2000 lbs/ton. Therefore provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

d. Emission Limitation: Visible PE shall not exceed 0 percent opacity as a six-minute average.

Applicable Compliance Method: Compliance with the visible emissions limitation established by this permit shall be determined by Method 9, 40 CFR Part 60 Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

e. Emission Limitations: clear gelcoats - 44%, by weight and all other gelcoats - 30%, by weight

Applicable Compliance Method: The permittee shall demonstrate compliance with the OC content limitations above through the recordkeeping requirements established in section d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

f. Emission Limitation: Limitation established pursuant to 40 CFR 63.5805

Applicable Compliance Method: The permittee shall demonstrate compliance with the emission limitation established pursuant to 40 CFR 63.5805 based upon the recordkeeping requirements specified in section d)(6) and the compliance requirements and test requirements specified in section f)(3) of the terms and conditions of this permit.

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

(2) USEPA Method 24 or Method 311 shall be used to determine the monomer (OC) content of each gelcoat. Formulation data or USEPA Method 24 shall be used to determine the OC content of each cleanup material.

(3) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 8, Item #1 and Table 9, Item #2 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

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

g) Miscellaneous Requirements

(1) None.

3. R010, Main Line #2 Gelcoat Booth and Curing Tunnel

Operations, Property and/or Equipment Description:

Gelcoat Booth and Curing Tunnel

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 3745-31-05(A)(3) (PTI #03-13262, issued 10/8/02)	19.51 lbs organic compounds (OC)/hr and 33.8 tons OC/yr, from gelcoats (for this emissions unit) 874 lbs OC per month and 5.2 tons OC/yr, from cleanup materials [See b)(2)a.] 0.53 lb particulate emissions (PE)/hr and 2.3 tons PE/yr Visible PE shall not exceed 0 percent opacity, as a six-minute average. See c)(3) The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-17-11(B) and 40 CFR, Part 63, Subpart WWWW.
b.	OAC rule 3745-17-07(A)	See b)(2)b. and b)(2)e.
c.	OAC rule 3745-17-11(B)	See b)(2)b. and b)(2)e.
d.	OAC rule 3745-17-11(C)	See c)(4) and b)(2)f.
e.	OAC rule 3745-21-07(G)(2)	Exempt, pursuant to OAC rule 3745-21-07(G)(9)(g) [See b)(2)c.] See b)(2)k.
f.	40 CFR, Part 63, Subpart WWWW [40 CFR 63.5780 – 63.5935]	Organic HAP Emissions Factors – 40 CFR 63.5796 through 63.5799 – See

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[In accordance with 40 CFR 63.5795(a), this emission unit is a new affected source consisting of open molding with atomized spray gel coat application and cleaning operations at an existing reinforced plastic composites production facility.]	b)(2)g. Standards – 40 CFR 63.5805(c) – See b)(2)h. See b)(2)i., b)(2)j., d)(6), e)(4) and f)(3)
g.	40 CFR 63.1 – 15 (40 CFR 63.5925)	Table 15 of Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The OC emissions, from cleanup materials, for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined, shall not exceed 874 lbs OC /month and 5.2 tons OC/yr.

b. The limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05.

c. In accordance with OAC rule 3745-21-07(G)(9)(g), best available technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).

d. The hourly OC emission limitation of 19.51 pounds was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, it is not necessary to develop monitoring, record keeping, and/or reporting requirements to ensure compliance with this limitation.

e. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.

f. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling of particulate emissions from surface coating processes. Paragraph (C) of OAC rule 3745-17-11, and c)(4) of this permit for this emissions unit, shall be federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

g. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5796	Organic HAP emissions factor equations in Table 1 of this subpart and how they are used in this subpart [See Table 1, Item #1.f of this subpart]
63.5797(a) – (c)	Determination of organic HAP content of resins and gel coats
63.5798(a) and (b)	If use or manufacture an application technology (new or existing) whose organic HAP emissions characteristics are not represented by the equations in Table 1 of this subpart
63.5799(a) – (c)	Calculating facility's organic HAP emissions on a ton per year basis for purposes of determining which paragraphs of 63.5805 apply

h. The permittee shall comply with the applicable standards required for existing affected sources pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the emission limitations stated in Table 3 of 40 CFR, Part 63, Subpart WWWW – Organic HAP Emission Limitations – Item #6 for open molding gel coat operations and the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #2 for cleaning operations.

i. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.
63.5805(e)	If new or existing facility subject to paragraph (a)(2) or (c) of this section at its initial compliance date that subsequently meets or exceeds the 100 tpy threshold in any calendar year, must notify permitting authority in compliance report. At the same time, you may request a one time exemption from the requirements of paragraph (a)(1) or (d) of this section in the compliance report.
63.5805(f)	If an exemption is applied in paragraph (e) of this section and the HAP emission thresholds specified in paragraph (a)(2) or (c) are subsequently exceeded over the next 12 month-period, must notify the permitting authority in the semiannual report, the exemption is removed and the facility must comply with paragraph (a)(1) or (d) of this section within 3 years from the time the organic HAP emissions first exceed the threshold.

j. The permittee shall comply with the standards for this emission unit by using the following compliance option:

63.5810	Options for meeting the standards for open molding operations at new or existing sources

k. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of

the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio=s State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)e. and b)(2)e.

c) Operational Restrictions

(1) The maximum monomer content, in weight percent, as applied, for the gelcoats employed in this emissions unit shall not exceed the following:

a. clear gelcoats - 44%, by weight; and

b. all other gelcoats - 30%, by weight.

[OAC rule 3745-77-07(A)(1) and PTI #03-13262]

(2) The use of any cleanup material containing Hazardous Air Pollutants (HAPs) in this emissions unit, as defined in 112(G) of the Clean Air Act, is prohibited.

[OAC rule 3745-77-07(A)(1) and PTI #03-13262]

(3) The use of any photochemically reactive cleanup material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

[OAC rule 3745-77-07(A)(1) and PTI #03-13262]

(4) The spray coating operation for this emissions unit shall be controlled by a dry particulate filter. The permittee shall follow all of these work practices:

a. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry filtration system with any modifications deemed necessary by the permittee during the time period in which the dry filtrations system is utilized.

b. The permittee shall operate the dry filtration system in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.

c. The permittee shall conduct periodic inspections of the dry filtration system to determine whether the device is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry filtration system while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.

d. The permittee shall document each inspection of the dry filtration system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.

e. In the event that the dry filtration system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control device is not operating in accordance with such requirements.

Any documentation required under c)(4)a. shall be maintained for not less than five years, and shall be made available to Ohio EPA upon request.

[OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification number of each cleanup material employed;

b. documentation on whether or not each cleanup material employed is a photochemically reactive material; and

c. documentation on whether or not each cleanup material employed contains any HAP.

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

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

a. the name and identification (i.e., clear gelcoat or another gelcoat) of each gelcoat employed; and

b. the monomer content, in weight percent, for each gelcoat, as applied.

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

(3) The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each gelcoat employed;

b. the weight fraction of monomer, in percent OC (by weight), for each gelcoat, as applied;

c. the weight, in pounds, of each gelcoat employed;

d. the total OC emissions, in pounds, for each gelcoat employed, calculated using the following equation:

Total OC emissions (lbs/month) = W x 0.68 x [(1.036 x P) - .195]*

Where:

W = weight, in pounds of each gelcoat

P = the weight fraction of monomer, in percent OC, for each gelcoat, as applied; and

e. the total OC emissions, in pounds, for all the gelcoats employed [summation of d)(3)d. for all gelcoats].

*based on Equation 7, Page 13, "CFA Emission Models for the Reinforced Plastics Industries," February 28, 1998

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

(4) The permittee shall collect and record the following information each month for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined:

a. the name and identification number of each cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the OC content of each cleanup material employed, in pounds per gallon;

d. the total OC emission rate for each cleanup material employed [d)(4)b. x d)(4)c.], in pounds; and

e. the total OC emission rate for all the cleanup materials employed [summation of d)(4)d. for all cleanup materials, divided by 2000], in tons.

The permittee may calculate the OC emissions from the cleanup materials in accordance with the following formula if waste cleanup materials are sent off site for disposal/reclamation:

OC emissions = summation of [(total gallons of each cleanup material used) x (solvent density of the cleanup material) -(total gallons of each cleanup material sent off site {minus solids}] x (solvent density of the cleanup material)] for all cleanup materials employed

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

(5) The permittee shall collect and record the following information each year:

a. The total OC emissions for all the gelcoats employed in this emissions unit [calculated by summing the monthly OC emission rates, from section d)(3)e., for the calendar year, divided by 2000], in tons.

b. The total OC emissions for all the cleanup materials employed in emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined [calculated by summing the monthly OC emission rates, from section d)(4)e., for the calendar year], in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

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

63.5895(c) and (d)	How to monitor and collect data to demonstrate continuous compliance
63.5915(a), (c) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

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

e) Reporting Requirements

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

a. all periods of time during which a photochemically reactive cleanup material was employed;

b. all periods of time during which a cleanup material containing any HAP was employed;

c. all periods of time during which a noncomplying gelcoat (i.e., for weight percent of monomer) was employed, including the number of pounds of any noncomplying gelcoat used and the weight fraction of styrene monomer for such material.

All quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation (from cleanup materials) of 874 pounds (for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined).

All quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

(3) The permittee shall submit annual reports that summarize the actual annual OC emissions (from the gelcoats) for this emissions unit, and the actual annual OC emissions (from the cleanup materials) for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined. These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A).

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

(4) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

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

f) Testing Requirements

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

a. Emission Limitations: 19.51 lbs OC/hr, from gelcoats (for this emissions unit) 33.8 tons OC/yr, from gelcoats (for this emissions unit)

Applicable Compliance Method: The hourly allowable OC emission limitation was established as follows:

allowable OC emissions (lbs/hr) = {W x 0.68 x [(1.036 x P) - .195]}*

Where:

W = the maximum gelcoats usage rate (lbs/hr)

P = the maximum allowable monomer content (44%, by weight)

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable OC emission limitation shall be determined pursuant to the recordkeeping requirements established in sections d)(3) and d)(5) of this permit.

*based on Equation 7, Page 13, "CFA Emission Models for the Reinforced Plastics Industries," February 28, 1998

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

b. Emission Limitations: 874 lbs OC/month and 5.2 tons OC/yr, from the use of cleanup materials (for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined)

Applicable Compliance Method: Compliance with the monthly and annual allowable OC emission limitations above shall be determined pursuant to the recordkeeping requirements established in sections d)(4) and d)(5) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

c. Emission Limitations: 0.53 lb PE/hr and 2.3 tons PE/yr

Applicable Compliance Methods: To determine the actual worst case PE rate (E), the following equation may be used for the paint spraying operation:

E = PE rate (lbs/hr)

E = maximum coating solids usage, in pounds per hour x (1-TE)(1-CE) where

TE = transfer efficiency, which is the ration of the amount of coating solids deposited on the coated part to the amount of coating solids used (assumed to be 62.5%)

CE = control efficiency of the control equipment (assumed to be 98%)

If required, the permittee shall demonstrate compliance with the above emissions limit in accordance with Methods 1 - 5, 40 CFR, Part 60 Appendix A.

The tons of PE/yr limitation was developed by multiplying the lb/hr limitation by 8760, and then dividing. Therefore provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

d. Emission Limitation: Visible PE shall not exceed 0 percent opacity as a six-minute average.

Applicable Compliance Method: Compliance with the visible emissions limitation established by this permit shall be determined by Method 9, 40 CFR Part 60 Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

e. Emission Limitations: clear gelcoats - 44%, by weight and all other gelcoats - 30%, by weight

Applicable Compliance Method: The permittee shall demonstrate compliance with the OC content limitations above through the recordkeeping requirements established in section d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

f. Emission Limitation: Limitation established pursuant to 40 CFR 63.5805

Applicable Compliance Method: The permittee shall demonstrate compliance with the emission limitation established pursuant to 40 CFR 63.5805 based upon the recordkeeping requirements specified in section d)(6) and the compliance requirements and test requirements specified in section f)(3) of the terms and conditions of this permit.

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

(2) USEPA Method 24 or Method 311 shall be used to determine the monomer (OC) content of each gelcoat. Formulation data or USEPA Method 24 shall be used to determine the OC content of each cleanup material.

[OAC rule 3745-77-07(C)(1) and PTI #03-13262]

(3) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 8, Item #1 and Table 9, Item #2 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

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

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group - Group 1: P001, P004,

EU ID	Operations, Property and/or Equipment Description
P001	Main Resin Automated Casting Line
P004	Custom Resin Casting Line

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 3745-31-05(A)(3) (PTI #03-8793, issued 10/24/02)	<u>For emission unit P001:</u> 6.67 lbs organic compounds (OC)/hr and 20.8 tons OC/yr, from gelcoats <u>For emission unit P004:</u> 3.17 lbs OC/hr and 7.9 tons OC/yr 874 lbs OC per month and 5.2 tons OC/yr, from cleanup materials [See b)(2)a.] See c)(3) The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-17-11(B) and 40 CFR, Part 63, Subpart WWWW.
b.	OAC rule 3745-21-07(G)(2)	Exempt, pursuant to OAC rule 3745-21-07(G)(9)(g) [See b)(2)b.] See b)(2)f.
c.	40 CFR, Part 63, Subpart WWWW [40 CFR 63.5780 – 63.5935] [In accordance with 40 CFR 63.5795(b), these emission units are existing affected sources consisting of closed molding operations,	Standards - 40 CFR 63.5805(b) - See b)(2)d. See b)(2)e.,d)(6), e)(4) and f)(3)

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	mixing, bulk molding compound (BMC) manufacturing operations and cleaning operations at an existing reinforced plastic composites production facility.]	
d.	40 CFR 63.1 – 15 (40 CFR 63.5925)	Table 15 of Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The total OC emissions (from cleanup materials) for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined, shall not exceed 874 lbs OC/month and 5.2 tons OC/yr.

b. In accordance with OAC rule 3745-21-07(G)(9)(g), Best Available Technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).

c. The hourly OC emission limitations of 6.67 pounds and 3.17 pounds were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, it is not necessary to develop monitoring, record keeping, and/or reporting requirements to ensure compliance with these limitations.

d. The permittee shall comply with the applicable standards required for existing affected sources pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Items #1, #2, #6, #7 and #8 for closed molding operations, cleaning operations, mixing and BMC manufacturing operations.

e. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be completed by the dates specified in Table 2 of this subpart.

f. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio=s State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)b. and b)(2)b.

c) Operational Restrictions

(1) The maximum monomer content, in weight percent, for the polyester resins employed in each emissions unit shall not exceed the following:

a. pigmented resin used in the veining process -18% (by weight), as applied; and

b. all other polyester resins - 33.5% (by weight), as applied.

[OAC rule 3745-77-07(A)(1) and PTI #03-8793]

(2) The use of any cleanup material containing Hazardous Air Pollutants (HAPs) in each emissions unit, as defined in 112(G) of the Clean Air Act, is prohibited.

[OAC rule 3745-77-07(A)(1) and PTI #03-8793]

(3) The use of any photochemically reactive cleanup material in each emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

[OAC rule 3745-77-07(A)(1) and PTI #03-8793]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for each emissions unit:

a. the name and identification number of each cleanup material employed;

b. documentation on whether or not each cleanup material employed is a photochemically reactive material; and

c. documentation on whether or not each cleanup material employed contains any HAP.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

(2) The permittee shall maintain daily records of the following information for each emissions unit:

a. the name and identification (i.e., pigmented resin used in the veining process or another polyester resin) of each polyester resin material employed; and

b. the monomer content, in weight percent, for each polyester resin material, as applied.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

(3) The permittee shall collect and record the following information each month for each emissions unit:

a. the name and identification number of each polyester resin material employed;

b. the monomer content, in weight percent, for each polyester resin material, as applied;

c. the weight, in pounds, of each polyester resin material employed;

d. the total OC emissions, in pounds, from each polyester resin material employed, calculated by the following equation:

total OC emissions (lbs/month) = b x c x 0.03*

where:

b = weight of each polyester resin material (from section d)(3)c. above)

c = the weight percent of monomer (OC) for each polyester resin material [from section d)(3)b. above]; and

e. the total OC emissions, in pounds, for all the polyester resin materials employed [summation of d)(3)d. for all polyester resin materials].

*OC emission factor from AP-42, Table 4.12-2 (revised 9/88)

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

(4) The permittee shall collect and record the following information each month for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined:

a. the name and identification number of each cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the OC content of each cleanup material employed, in pounds per gallon;

d. the total OC emission rate for each cleanup material employed [d)(4)b. x d)(4)c.], in pounds; and

e. the total OC emission rate for all the cleanup materials employed [summation of d)(4)d. for all cleanup materials, divided by 2000], in tons.

The permittee may calculate the OC emissions from the cleanup materials in accordance with the following formula if waste cleanup materials are sent off site for disposal/reclamation:

OC emissions = summation of [(total gallons of each cleanup material used) x (solvent density of the cleanup material) -(total gallons of each cleanup material sent off site [minus solids]) x (solvent density of the cleanup material)] for all cleanup materials employed

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

(5) The permittee shall collect and record the following information each year:

a. The total OC emissions for all the polyester resin materials employed in each emissions unit [calculated by summing the monthly OC emission rates, from section d)(3)e., for the calendar year, divided by 2000], in tons.

b. The total OC emissions for all the cleanup materials employed in emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined [calculated by summing the monthly OC emission rates, from section d)(4)e., for the calendar year], in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

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

63.5915(a) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

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

e) Reporting Requirements

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

a. all periods of time during which a photochemically reactive cleanup material was employed;

b. all periods of time during which a cleanup material containing any HAP was employed

c. all periods of time during which a noncomplying polyester resin material (i.e., for weight percent of monomer) was employed, including the number of pounds of any noncomplying polyester resin material used and the weight fraction of styrene monomer for such material.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation (from cleanup materials) of 874 pounds (for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined).

All quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

(3) The permittee shall submit annual reports that summarize the actual annual OC emissions (from the polyester resin materials) for each emissions unit and the actual annual OC emissions (from the cleanup materials) for emissions units P001, P004,

P010, R001, R002, R003, R004, R005, and R010, combined). These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A).

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

(4) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

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

f) Testing Requirements

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

a. Emission Limitations: 6.67 lbs OC/hr and 20.8 tons OC/yr

Applicable Compliance Method: The hourly allowable OC emission limitation was established as follows:

i. multiply the maximum resin materials usage rate (lbs/hr) by the maximum allowable monomer content (33.5%, by weight); and

ii. multiply the result from section f)(1)a.i. by an emission factor of 0.03.*

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable OC emission limitation shall be determined pursuant to the recordkeeping requirements established in sections d)(3) and d)(5) of this permit.

* OC emission factor from AP-42, Table 4.12-2 (revised 9/88)

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

b. Emission Limitations: 3.17 lbs OC/hr and 7.9 tons OC/yr

Applicable Compliance Method: The hourly allowable OC emission limitation was established as follows:

i. multiply the maximum resin materials usage rate (lbs/hr) by the maximum allowable monomer content (33.5%, by weight); and

ii. multiply the result from section f)(1)b.i. by an emission factor of 0.03.*

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable OC emission limitation shall be determined pursuant to the recordkeeping requirements established in sections d)(3) and d)(5) of this permit.

* OC emission factor from AP-42, Table 4.12-2 (revised 9/88)

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

c. Emission Limitations: 874 lbs OC/month and 5.2 tons OC/yr, from the use of cleanup materials (for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined)

Applicable Compliance Method: Compliance with the monthly and annual allowable OC emission limitations above shall be determined pursuant to the recordkeeping requirements established in sections d)(4) and d)(5) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

d. Emission Limitations: pigmented resin used in the veining process -18%, by weight andall other polyester resins - 33.5%, by weight

Applicable Compliance Method: The permittee shall demonstrate compliance with the OC content limitations above through the recordkeeping requirements established in section d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

(2) USEPA Method 24 or Method 311 shall be used to determine the monomer (OC) content of each polyester resin material. Formulation data or USEPA Method 24 shall be used to determine the OC content of each cleanup material.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

(3) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Items #1, #2, #6, #7 and #8 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

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

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group - Group 2: R001, R002, R003, R004,

EU ID	Operations, Property and/or Equipment Description
R001	One of Four Gelcoat Booths on Main Resin Line
R002	One of Four Gelcoat Booths on Main Resin Line
R003	One of Four Gelcoat Booths on Main Resin Line
R004	One of Four Gelcoat Booths on Main Resin Line

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 3745-31-05(A)(3) (PTI #03-8793, issued on 10/24/02)	11.54 lbs organic compounds (OC)/hr, from gelcoats (for each emission unit individually) 36.0 tons OC/yr, from gelcoats [See b)(2)a.] 874 lbs OC per month and 5.2 tons OC/yr, from cleanup materials [See b)(2)b.] 0.31 lb particulate emissions (PE)/hr and 1.4 tons PE/yr (for each emissions unit individually) Visible PE shall not exceed 0 percent opacity, as a six-minute average. See c)(3) The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-17-11(B).
b.	OAC rule 3745-17-07(A)	See b)(2)c. and b)(2)f.
c.	OAC rule 3745-17-11(B)	See b)(2)c. and b)(2)f.
d.	OAC rule 3745-17-11(C)	See c)(4) and b)(2)g.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-21-07(G)(2)	Exempt, pursuant to OAC rule 3745-21-07(G)(9)(g) [See b)(2)d.] See b)(2)l.
f.	40 CFR, Part 63, Subpart WWWW [40 CFR 63.5780 – 63.5935] [In accordance with 40 CFR 63.5795(b), these emission units are existing affected sources consisting of open molding with atomized spray gel coat application and cleaning operations at an existing reinforced plastic composites production facility.]	Organic HAP Emissions Factors – 40 CFR 63.5796 through 63.5799 – See b)(2)h. Standards – 40 CFR 63.5805(b) – See b)(2)i. See b)(2)j., b)(2)k., d)(6), e)(4) and f)(3)
g.	40 CFR 63.1 – 15 (40 CFR 63.5925)	Table 15 of Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions 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 emissions, from gelcoats, for emissions units R001, R002, R003, and R004, combined, shall not exceed 36.0 tons.

b. The OC emissions, from cleanup materials, for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined, shall not exceed 874 lbs OC /month and 5.2 tons OC/yr.

c. The limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05.

d. In accordance with OAC rule 3745-21-07(G)(9)(g), best available technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).

e. The hourly OC emission limitation of 11.54 pounds was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, it is not necessary to develop monitoring, record keeping, and/or reporting requirements to ensure compliance with this limitation.

f. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.

g. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling of particulate emissions from surface

coating processes. Paragraph (C) of OAC rule 3745-17-11, and c)(4) of this permit for this emissions unit, shall be federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

h. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5796	Organic HAP emissions factor equations in Table 1 of this subpart and how they are used in this subpart [See Table 1, Item #1.f of this subpart]
63.5797(a) – (c)	Determination of organic HAP content of resins and gel coats
63.5798(a) and (b)	If use or manufacture an application technology (new or existing) whose organic HAP emissions characteristics are not represented by the equations in Table 1 of this subpart
63.5799(a) – (c)	Calculating facility's organic HAP emissions on a ton per year basis for purposes of determining which paragraphs of 63.5805 apply

i. The permittee shall comply with the applicable standards required for existing affected sources pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the emission limitations stated in Table 3 of 40 CFR, Part 63, Subpart WWWW – Organic HAP Emission Limitations – Item #6 for open molding gel coat operations and the requirements as stated in Table 4 of 40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Item #2 for cleaning operations.

j. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.

k. The permittee shall comply with the standards for this emission unit by using the following compliance option:

63.5810	Options for meeting the standards for open molding operations at new or existing sources

l. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio=s State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)91)e. and b)(2)d.

c) Operational Restrictions

(1) The maximum monomer content, in weight percent, as applied, for the gelcoats employed in this emissions unit shall not exceed the following:

a. clear gelcoats - 44%, by weight; and

b. all other gelcoats - 30%, by weight.

[OAC rule 3745-77-07(A)(1) and PTI #03-8793]

(2) The use of any cleanup material containing Hazardous Air Pollutants (HAPs) in this emissions unit, as defined in 112(G) of the Clean Air Act, is prohibited.

[OAC rule 3745-77-07(A)(1) and PTI #03-8793]

(3) The use of any photochemically reactive cleanup material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

[OAC rule 3745-77-07(A)(1) and PTI #03-8793]

(4) The spray coating operation for this emissions unit shall be controlled by a dry particulate filter. The permittee shall follow all of these work practices:

a. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry filtration system with any modifications deemed necessary by the permittee during the time period in which the dry filtrations system is utilized.

b. The permittee shall operate the dry filtration system in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.

c. The permittee shall conduct periodic inspections of the dry filtration system to determine whether the device is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry filtration system while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.

d. The permittee shall document each inspection of the dry filtration system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.

e. In the event that the dry filtration system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control device is not operating in accordance with such requirements.

Any documentation required under c)(4)a. shall be maintained for not less than five years, and shall be made available to Ohio EPA upon request.

[OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification number of each cleanup material employed;

b. documentation on whether or not each cleanup material employed is a photochemically reactive material; and

c. documentation on whether or not each cleanup material employed contains any HAP.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

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

a. the name and identification (i.e., clear gelcoat or another gelcoat) of each gelcoat employed; and

b. the monomer content, in weight percent, for each gelcoat, as applied.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

(3) The permittee shall collect and record the following information each month for emissions units R001, R002, R003, and R004, combined:

a. the name and identification number of each gelcoat employed;

b. the weight fraction of monomer, in percent OC (by weight), for each gelcoat, as applied;

c. the weight, in pounds, of each gelcoat employed;

d. the total OC emissions, in pounds, for each gelcoat employed, calculated using the following equation:

Total OC emissions (lbs/month) = W x 0.68 x [(1.036 x P) - .195]*

Where:

W = weight, in pounds of each gelcoat

P = the weight fraction of monomer, in percent OC, for each gelcoat, as applied; and

e. the total OC emissions, in pounds, for all the gelcoats employed [summation of d)(3)d. for all gelcoats].

*based on Equation 7, Page 13, "CFA Emission Models for the Reinforced Plastics Industries," February 28, 1998

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

(4) The permittee shall collect and record the following information each month for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined:

a. the name and identification number of each cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the OC content of each cleanup material employed, in pounds per gallon;

d. the total OC emission rate for each cleanup material employed [d)(4)b. x d)(4)c.], in pounds; and

e. the total OC emission rate for all the cleanup materials employed [summation of d)(4)d. for all cleanup materials, divided by 2000], in tons.

The permittee may calculate the OC emissions from the cleanup materials in accordance with the following formula if waste cleanup materials are sent off site for disposal/reclamation:

OC emissions = summation of [(total gallons of each cleanup material used) x (solvent density of the cleanup material) -(total gallons of each cleanup material sent off site [minus solids]) x (solvent density of the cleanup material)] for all cleanup materials employed

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

(5) The permittee shall collect and record the following information each year:

a. The total OC emissions for all the gelcoats employed in emissions units R001, R002, R003, and R004, combined [calculated by summing the monthly OC emission rates, from section d)(3)e., for the calendar year, divided by 2000], in tons.

b. The total OC emissions for all the cleanup materials employed in emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined

[calculated by summing the monthly OC emission rates, from section d)(4)e., for the calendar year], in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

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

63.5895(c) and (d)	How to monitor and collect data to demonstrate continuous compliance
63.5915(a), (c) and (d)	Records that must be kept
53.5920(a) – (d)	In what form and for how long records must be kept

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

e) Reporting Requirements

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

a. all periods of time during which a photochemically reactive cleanup material was employed;

b. all periods of time during which a cleanup material containing any HAP was employed;

c. all periods of time during which a noncomplying gelcoat (i.e., for weight percent of monomer) was employed, including the number of pounds of any noncomplying gelcoat used and the weight fraction of styrene monomer for such material.

All quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation (from cleanup materials) of 874 pounds (for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined).

All quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

(3) The permittee shall submit annual reports that summarize the actual annual OC emissions (from the gelcoats) for emissions units R001, R002, R003, and R004, combined, and the actual annual OC emissions (from the cleanup materials) for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010,

combined). These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A).

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

(4) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a) and (b)	Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]
63.5910(a) – (d), (f) – (i)	Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]

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

f) Testing Requirements

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

a. Emission Limitations: 11.54 lbs OC/hr (for each emission unit individually) and 36.0 tons OC/yr, from gelcoats (for emissions units R001, R002, R003, and R004, combined)

Applicable Compliance Method: The hourly allowable OC emission limitation was established as follows:

allowable OC emissions (lbs/hr) = {W x 0.68 x [(1.036 x P) - .195]}*

Where:

W = the maximum gelcoats usage rate (lbs/hr)

P = the maximum allowable monomer content (44%, by weight)

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable OC emission limitation shall be determined pursuant to the record keeping requirements established in sections d)(3) and d)(5) of this permit.

*based on Equation 7, Page 13, "CFA Emission Models for the Reinforced Plastics Industries," February 28, 1998

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

b. Emission Limitations: 874 lbs OC/month and 5.2 tons OC/yr, from the use of cleanup materials (for emissions units P001, P004, P010, R001, R002, R003, R004, R005, and R010, combined)

Applicable Compliance Method: Compliance with the monthly and annual allowable OC emission limitations above shall be determined pursuant to the record keeping requirements established in sections d)(4) and d)(5) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

c. Emission Limitations: 0.31 lb PE/hr and 1.4 tons PE/yr (for each emission unit individually)

Applicable Compliance Method: To determine the actual worst case PE rate (E), the following equation may be used for the paint spraying operation:

E = PE rate (lbs/hr)

E = maximum coating solids usage, in pounds per hour x (1-TE)(1-CE) where

TE = transfer efficiency, which is the ration of the amount of coating solids deposited on the coated part to the amount of coating solids used (assumed to be 62.5%)

CE = control efficiency of the control equipment (assumed to be 98%)

If required, the permittee shall demonstrate compliance with the above emissions limit in accordance with Methods 1 - 5, 40 CFR, Part 60 Appendix A.

The tons of PE/yr limitation was developed by multiplying the lb/hr limitation by 8760, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

d. Emission Limitation: Visible PE shall not exceed 0 percent opacity as a six-minute average.

Applicable Compliance Method: Compliance with the visible emissions limitation established by this permit shall be determined by Method 9, 40 CFR Part 60 Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

e. Emission Limitations: clear gelcoats - 44%, by weight and all other gelcoats - 30%, by weight

Applicable Compliance Method: The permittee shall demonstrate compliance with the OC content limitations above through the record keeping requirements established in section d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-8793]

f. Emission Limitation: Limitation established pursuant to 40 CFR 63.5805

Applicable Compliance Method: The permittee shall demonstrate compliance with the emission limitation established pursuant to 40 CFR 63.5805 based upon the record keeping requirements specified in section d)(6) and the compliance requirements and test requirements specified in section f)(3) of the terms and conditions of this permit.

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

(2) USEPA Method 24 or Method 311 shall be used to determine the monomer (OC) content of each gelcoat. Formulation data or USEPA Method 24 shall be used to determine the OC content of each cleanup material.

(3) [OAC rule 3745-77-07(C)(1) and PTI #03-8793] The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5840	Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 8, Item #1 and Table 9, Item #2 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

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

g) Miscellaneous Requirements

(1) None.