



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

10/7/2010

Certified Mail

Ron Clark
Allied Moulded Products, Inc.
222 N. Union Street
P.O. BOX 587
Bryan, OH 43506

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0386010104
Permit Number: P0106575
Permit Type: Administrative Modification
County: Williams

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Bryan Times. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

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

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,


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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-NWDO; Michigan; Indiana

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
Allied Moulded Products, Inc.

Issue Date: 10/7/2010
Permit Number: P0106575
Permit Type: Administrative Modification
Permit Description: Administrative modification to add OAC rule 3745-21-25 and to update SB265 language.
Facility ID: 0386010104
Facility Location: Allied Moulded Products, Inc.
222 N. Union Street, P.O. BOX 587
Bryan, OH 43506
Facility Description: All Other Plastics Product Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Donald Waltermeyer at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 or (419)352-8461. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



DRAFT

**Division of Air Pollution Control
Permit-to-Install
for
Allied Moulded Products, Inc.**

Facility ID: 0386010104
Permit Number: P0106575
Permit Type: Administrative Modification
Issued: 10/7/2010
Effective: To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Allied Moulded Products, Inc.

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Authorization

Facility ID: 0386010104
Facility Description: Plastics Products
Application Number(s): A0039875
Permit Number: P0106575
Permit Description: Administrative modification to add OAC rule 3745-21-25 and to update SB265 language.
Permit Type: Administrative Modification
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 10/7/2010
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Allied Moulded Products, Inc.
222 N. Union Street
P.O. BOX 587
Bryan, OH 43506

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0106575

Permit Description: Administrative modification to add OAC rule 3745-21-25 and to update SB265 language.

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

Emissions Unit ID:	P052
Company Equipment ID:	RTM Station 1
Superseded Permit Number:	03-17358
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	P054
Company Equipment ID:	Assembly 1
Superseded Permit Number:	03-17358
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	R001
Company Equipment ID:	Gelcoat Spray Booth
Superseded Permit Number:	03-17358
General Permit Category and Type:	Not Applicable



A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

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

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

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

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

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

Effective Date: To be entered upon final issuance

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

14. Public Disclosure

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

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

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

16. Fees

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

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.

2. The following emissions units contained in this permit are subject to 40 CFR, Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production: P052, P054 and R001. 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 Ohio EPA, Northwest District Office.

[40 CFR, Part 63, Subpart WWWW]

3. The following emissions units contained in this permit are subject to 40 CFR, Part 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: P054. 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 Ohio EPA, Northwest District Office.

[40 CFR, Part 63, Subpart PPPP]

C. Emissions Unit Terms and Conditions



1. P052, RTM Station 1

Operations, Property and/or Equipment Description:

Resin transfer molding station 1.

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 are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	0.68 lb organic compounds (OC)/hr and 2.98 tons OC/yr* See b)(2)a.
b.	OAC rule 3745-21-07(G)(2)	See b)(2)b and g.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)c.
d.	OAC rule 3745-21-25	See b)(2)d, b)(2)h, d)(2) and e)(2). [Once OAC rule 3745-21-25 is approved as part of the Ohio SIP, and upon achieving compliance with this rule, the reinforced plastic composites production operations at the facility are not required to meet OAC rule 3745-21-07.]
e..	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930) [In accordance with 40 CFR 63.5795(a), these emission units are new affected source consisting of BMC manufacturing operations at an existing reinforced plastic composites production facility.]	Standards - 40 CFR 63.5805(b) – See b)(2)e. See b)(2)f., d)(3), e)(3) and f)(2)
f.	40 CFR 63.1 – 15 (40 CFR 63.5925)	Table 15 to 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 permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.
b. The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3). [The potential to emit for this emissions unit is less than the allowable emission limitation established pursuant to this rule.]
c. This rule paragraph applies once U.S. EPA approves December 1, 2006 version of OAC rule 3745-31-05, as part of the State Implementation Plan.

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

The potential to emit for this emissions unit is 2.98 tons VOC per year and was determined by multiplying a maximum resin paste usage rate of 168 lbs/hr x 0.286 lb VOC/lb resin paste employed x an emission factor of 0.01 lb VOC/lb VOC applied + a maximum mold release usage rate of 0.20 lb/hr x 1 lb OC/lb mold release employed x an emission factor of 1 lb VOC/lb mold release applied, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

- d. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:

Table with 2 columns: OAC rule reference and description of requirements. Rows include VOC control requirements, Calculation of facility's VOC emissions threshold, and Compliance dates.

- e. The permittee shall comply with the applicable standards required for all affected sources at an existing facility pursuant to 40 CFR 63.5805(b). Pursuant to this regulation, this emission unit shall meet the requirements as stated in Table 4 of



Effective Date: To be entered upon final issuance

40 CFR, Part 63, Subpart WWWW – Work Practice Standards – Items #6, #7 and #8 for mixing and BMC manufacturing operations.

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

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

g. On February 18, 2008, Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio’s State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirements of OAC rule 3745-21-07(G)(2) still exists as part of the federally-approved SIP of Ohio.

h. On December 14, 2009, OAC rule 3745-21-25 which establishes control of VOC emissions from reinforced plastic composites production operation was added to OAC rule 3745-21. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves of OAC rule 3745-21-25 as an addition to the Ohio State Implementation Plan.

The following terms shall become federally enforceable after U.S. EPA approves the rule addition: b)(1)d, b)(2)d, d)(2), and e)(2).

The following terms and conditions shall become void after U.S. EPA approves the rule addition: b)(1)b.

- All OCs are assumed to be VOCs.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the molding operation:

- a. The company identification for each resin paste/mold release agent employed;
b. The amount of each paste/mold release agent employed, in pounds;
c. The organic compound content, in percent by weight, for each resin paste/mold release agent employed;



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- d. The organic compound emission rate for each resin paste/mold release agent employed, in lbs/month [i.e., d)(1)b. x d)(1)c. x an emission factor of 0.01 lb OC/lb OC employed or 1.0 lb OC/lb mold release agent employed] for each resin paste/mold release employed;
e. The total organic compound emission rate for all resins/mold release agents employed, in lbs/month [i.e., the sum of d)(1)d.]; and
f. The annual year-to-date organic compound emissions from all resin paste/release agents employed, in tons [i.e., the sum of d)(1)e. for each calendar month to date from January to December x total calendar months to date x 1 ton/2000 lbs].
(2) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25:

Table with 2 columns: OAC rule 3745-21-25(O)(1) / Demonstration of continuous compliance and the associated monitoring and data collection requirements; OAC rule 3745-21-25(P)(1) and (P)(4) / Record keeping requirements

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

Table with 2 columns: 63.5915(a) and (d) / Records that must be kept; 63.5920(a) - (d) / In what form and for how long records must be kept

e) Reporting Requirements

- (1) The permittee shall submit annual reports that specify the total organic compound emissions from emissions unit P052 for the previous calendar year. These reports shall be submitted by January 31 of each year and shall be submitted in accordance with the Standard Terms and Conditions of this permit.
(2) 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 by OAC rule 3745-21-25:

Table with 2 columns: OAC rule 3745-21-25(Q)(1), (Q)(2), (Q)(3), (Q)(4) and (Q)(5) / Reporting requirements; OAC rule 3745-21-25(S)(1) and (S)(2) / Requirements on applicability notification, permit application and testing notification

- (3) 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:



Table with 2 columns: Regulatory Code and Description. Row 1: 63.5905(a) and (b) - Notifications that must be submitted and when [63.5905(a) - See Table 13 of this subpart]. Row 2: 63.5910(a) - (d), (f) - (i) - Reports that must be submitted and when [63.5910(a) - See Table 14 of this subpart].

f) Testing Requirements

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

a. Emission Limitation: 0.68 lb OC/hr

Applicable Compliance Method: The hourly OC emission limitation was developed by multiplying a maximum resin paste usage rate of 168 lbs/yr by 0.286 lb OC/lb resin paste employed by an emission factor of 0.01 lb OC/lb of OC applied added to a maximum mold release usage rate of 0.20 lb/hr by 1lb OC/lb mold release employed by an emission factor of 1 lb OC/lb mold release applied.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with Methods 1-4 and 18, 25 or 25A, as appropriate of 40 CFR, Part 60, Appendix A.

b. Emission Limitation: 2.98 tons OC/yr

Applicable Compliance Method: The annual OC emission limitation was developed by multiplying the lbs OC/yr emission limitation by a maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. [Also, compliance with the annual emission limitation shall be demonstrated based on the record keeping requirements in section d).]

Therefore, provided compliance is shown with the hourly limitation, compliance with the annual emission limitation shall also be demonstrated.

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

Table with 2 columns: Regulatory Code and Description. Row 1: 63.5835(a) and (c) - General compliance requirements. Row 2: 63.5840 - Testing and initial compliance requirements - dates performance tests or other initial compliance demonstrations must be conducted. Row 3: 63.5860(a) - Testing and initial compliance requirements - how initial compliance with standards must be demonstrated [See Table 9, Items #6, #7 and #8 of this subpart]. Row 4: 63.5900(a) - (c) - Continuous compliance requirements.

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- g) Miscellaneous Requirements
 - (1) None.



2. P054, Assembly 1

Operations, Property and/or Equipment Description:

Assembly station 1.

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 are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	0.34 lb organic compound (OC)/hr and 1.49 tons OC/yr* See b)(2)a.
b.	OAC rule 3745-21-07(G)(2)	See b)(2)b and h
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)c.
d.	OAC rule 3745-21-25	See b)(2)d., d)(2) and e)(2)
e.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930) [In accordance with 40 CFR 63.5795(a), this emission unit is a new affected source consisting of BMC manufacturing operations at an existing reinforced plastic composites production facility.]	Standards - 40 CFR 63.5805(b) – See b)(2)e. See b)(2)f., d)(3), e)(3) and f)(2)
f.	40 CFR 63.1 – 15 (40 CFR 63.5925)	Table 15 to 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.
g.	40 CFR Part 63, Subpart PPPP (40 CFR 63.4480 – 63.4581) [In accordance with 40 CFR 63.4482(c), this emission unit is a new affected source consisting of general use coatings operations at	For each new general use coating affected source: 0.16 kg (0.16 lb) organic hazardous air pollutant (HAP) emitted per kg (lb) coating solids used during each 12-month compliance period [40 CFR 63.4490(a)(1)]



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	an existing reinforced plastic composites production facility.]	See b)(2)g., d)(4), e)(4) and f)(3)
h.	40 CFR 63.1 – 15 (40 CFR 63.4501)	Table 2 to Subpart PPPP 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 permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio’s State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.
- b. The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3). [The potential to emit for this emissions unit is less than the allowable emission limitation established pursuant to this rule.]
- c. This rule paragraph applies once U.S. EPA approves December 1, 2006 version of OAC rule 3745-31-05, as part of the State Implementation Plan.

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

The potential to emit for this emissions unit is 1.49 tons VOC/yr and was determined by multiplying a maximum emission rate of 0.34 lb VOC/hr by a maximum operating rate of 8760 hrs/yr and dividing by 2000 lbs/ton. The maximum lb/hr emission rate was determined using the following:

Raw Material	Maximum Throughput (lb/hr)	VOC Employed	VOC Content (lb VOC/lb thinned gelcoat or adhesive]	Emission Factor lb VOC emitted/lb OC applied	Lb/hr VOC emitted
Thinned Gelcoat	0.8	Styrene	0.299	0.1257	0.03



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Table with 6 columns: Raw Material, Maximum Throughput (lb/hr), VOC Employed, VOC Content (lb VOC/lb thinned gelcoat or adhesive), Emission Factor lb VOC emitted/lb OC applied, Lb/hr VOC emitted. Rows include Thinned Gelcoat, Adhesive, and Total.

- d. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:

Table with 2 columns: OAC rule reference and VOC control requirements. Rows include OAC rule 3745-21-25(D)(1), (D)(2), (D)(5) and (D)(6); OAC rule 3745-21-25(F)(1), (F)(3), (F)(4), (F)(5) and (F)(6); and OAC rule 3745-21-25(R)(1) and (R)(2).

- e. The permittee shall comply with the applicable standards required for all affected sources at an existing facility 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 #6, #7 and #8 for mixing and BMC manufacturing operations.
f. The company shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

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

- g. The permittee has elected to use either the compliance option provided by 40 CFR 63.4491(a) [compliant material option] or 40 CFR 63.4491(b) [emission rate without add-on controls option]. This is accomplished by demonstrating that the organic HAP emissions rate for the coating operation is less than or equal to the applicable emission limit in 63.4490, calculated as a rolling 12-month emissions rate and determined on a monthly basis. The permittee must meet all of the requirements of 63.4540, 63.4541 and 63.4542 for the compliant material option, if this option is chosen, or 63.4550, 63.4551, and 63.4552 for the emission rate without add-on controls option, if this option is chosen, to demonstrate compliance with the emissions limit. The permittee is required to notify the Ohio EPA, Northwest District Office prior to the use of another compliance option as identified in 40 CFR 63.4491.



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h. On February 18, 2008, Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirements of OAC rule 3745-21-07(G)(2) still exists as part of the federally-approved SIP of Ohio.

- All OCs are assumed to be VOCs.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the assembly operation:

- a. The company identification for each thinned gelcoat/adhesive employed;
b. The amount of each thinned gelcoat/adhesive employed, in pounds;
c. The organic compound content, in percent by weight, for each thinned gelcoat/adhesive employed;
d. The organic compound emission rate for each thinned gelcoat/adhesive employed in lbs/month [i.e., d)(1)b. x d)(1)c. x the appropriate emission factor from the table listed below] for each thinned gelcoat/adhesive employed;

Table with 3 columns: Raw Material, OC Employed, Emission Factor (lb OC emitted/lb OC applied). Rows include Thinned Gelcoat (Styrene, MMA, Acetone) and Adhesive (MMA).

e. The total organic compound emission rate for all thinned gelcoats/adhesives employed, in lbs/month [i.e., sum of d)(1)d.]; and

The annual year-to-date organic compound emissions from all thinned gelcoats/adhesives employed, in tons [i.e., sum of d)(1)e. for each calendar month to date from January to December x total calendar months to date x 1 ton/2000lbs].

(2) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25:



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OAC rule 3745-21-25(O)(1)	Demonstration of continuous compliance and the associated monitoring and data collection requirements
OAC rule 3745-21-25(P)(1) and (P)(4)	Recordkeeping requirements

- (3) 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

- (4) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart PPPP (the predominant activity at the facility), including the following sections:

63.4530	Records that must be kept
63.4531	In what form and for how long records must be kept

e) Reporting Requirements

- (1) The permittee shall submit annual reports that specify the total organic compound emissions from emissions unit P054 for the previous calendar year. These reports shall be submitted by January 31 of each year and shall be submitted in accordance with the Standard Terms and Conditions of this permit.
- (2) 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 by OAC rule 3745-21-25:

OAC rule 3745-21-25(Q)(1), (Q)(2), (Q)(3), (Q)(4) and (Q)(5)	Reporting requirements
OAC rule 3745-21-25(S)(1) and (S)(2)	Requirements on applicability notification, permit application and testing notification

- (3) 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]



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

Table with 2 columns: Code and Description. Row 1: 63.4510 Notifications that must be submitted. Row 2: 63.4520 Reports that must be submitted.

f) Testing Requirements

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

a. Emission Limitation: 0.34 lb OC/hr

Applicable Compliance Method: The hourly OC emission limitation was developed by multiplying a maximum throughput of each raw material by the lb OC/ lb raw material by an emission factor of lb OC emitted/lb OC applied. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with Methods 1-4 and 18, 25 or 25A, as appropriate of 40 CFR, Part 60, Appendix A.

b. Emission Limitation: 1.49 tons OC/yr

Applicable Compliance Method: The annual OC emission limitation was developed by multiplying the lbs OC/yr emission limitation by a maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton.

Also, compliance with the annual emission limitation shall be demonstrated based on the record keeping requirements in section d).]

Therefore, provided compliance is shown with the hourly limitation, compliance with the annual emission limitation shall also be demonstrated.

c. Emission Limitation: For each new general use coating affected source - 0.16 kg (0.16 lb) organic hazardous air pollutant (HAP) emitted per kg (lb) coating solids used during each 12-month compliance period

Applicable Compliance Method: The permittee shall demonstrate compliance with this limitation based upon the record keeping requirements specified in section d)(4) and the compliance requirements and test requirements specified in section f)(3) of the terms and conditions of this permit.

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

Table with 2 columns: Code and Description. Row 1: 63.5835(a) and (c) General compliance requirements. Row 2: 63.5840 Testing and initial compliance requirements – dates performance tests or other initial compliance demonstrations must be



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	conducted
63.5860(a)	Testing and initial compliance requirements – how initial compliance with standards must be demonstrated [See Table 9, Items #6, #7 and #8 of this subpart]
63.5900(a) – (c)	Continuous compliance requirements

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

63.4500	General requirements for complying with this subpart
63.4540	Compliance Requirements for the Compliant Material Option – By what date must I conduct the initial compliance demonstration*
63.4541	Compliance Requirements for the Compliant Material Option – How do I demonstrate initial compliance with the emission limitations*
63.4542	Compliance Requirements for the Compliant Material Option – How do I demonstrate continuous compliance with the emission limitations*
63.4550	Compliance Requirements for the Emission Rate Without Add-On Controls – By what date must I conduct the initial compliance demonstration*
63.4551	Compliance Requirements for the Emission Rate Without Add-On Controls – How do I demonstrate initial compliance with the emission limitations*
63.4552	Compliance Requirements for the Emission Rate Without Add-On Controls – How do I demonstrate continuous compliance with the emission limitations*

*The permittee has elected to use either the compliance option provided by 40 CFR 63.4491(a) [compliant material option] or 40 CFR 63.4491(b) [emission rate without add-on controls option]. The permittee must meet all of the requirements of 63.4540, 63.4541 and 63.4542 for the compliant material option, if this option is chosen, or 63.4550, 63.4551, and 63.4552 for the emission rate without add-on controls option, if this option is chosen, to demonstrate compliance with the emissions limit [See b)(2)g.].

g) Miscellaneous Requirements

- (1) None.



3. R001, Gelcoat Spray Booth

Operations, Property and/or Equipment Description:

Gelcoat application booth.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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 are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

(2)

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	BAT requirements for this emissions unit have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [see b)(2)m]. See b)(2)a. and b)(2)b.
b.	OAC rule 3754-31-05(F)	7.3 tons volatile organic compounds (VOC)/yr See b)(2)m.
c.	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day See b)(2)c.
d.	OAC rule 3745-17-11(B)(2)	See b)(2)d.
e.	OAC rule 3745-17-07(A)	See b)(2)e.
f.	OAC rule 3745-17-11(C)	See b)(2)n, c)(1), and d)(4) through d)(10).
g.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)f. and b)(2)g.
h.	OAC rule 3745-21-25	See b)(2)h., d)(2) and e)(2) [Once OAC rule 3745-21-25 is approved as part of the Ohio SIP, and upon achieving compliance with this rule, the reinforced plastic composites production operations at the facility are not required



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		to meet OAC rule 3745-21-07.]
i.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930) [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 at an existing reinforced plastic composites production facility.]	Organic HAP Emissions Factors – 40 CFR 63.5796 through 63.5799 – See b)(2)i. Standards – 40 CFR 63.5805(b) – See b)(2)j. See b)(2)k., b)(2)l., d)(3), (e)(3) and f)(2)
j.	40 CFR 63.1 – 15 (40 CFR 63.5925)	Table 15 to 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.

(3) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio’s State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.
- b. Compliance with OAC rule 3745-31-05(A)(3) also includes compliance with OAC rule 3745-21-07(G)(2).
- c. 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., d)(1) and e)(1).

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The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S. EPA approves the rule revision:

None.

- d. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-71-11(A)(2)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11(B)(2).

[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.]

- e. This emission unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PM10) from this air contaminant source because the calculated annual emission rate for PE is less than ten tons per year.

The potential to emit for PE from the gelcoat spray booth is negligible and has not been quantified to establish a potential to emit value for this emissions unit.

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

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the VOC emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration practically and legally enforceable voluntary restrictions established in this permit.

- h. The permittee shall comply with the applicable requirements under OAC rule 3745-21-25:



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Table with 2 columns: OAC rule reference and description of requirements. Rows include VOC control requirements, procedures for determination of VOC emission factors, calculation of facility's VOC emissions threshold, options for meeting VOC emissions limits, and compliance dates.

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

Table with 2 columns: CFR reference and description of requirements. Rows include organic HAP emissions factor equations, determination of organic HAP content, application technology requirements, and organic HAP emissions calculation.

j. The permittee shall comply with the applicable standards required for all affected sources at an existing facility 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.

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

Table with 2 columns: CFR reference and description of requirements. Row includes compliance with standards in this subpart must be met by the dates specified in Table 2 of this subpart.

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



Table with 2 columns: ID (63.5810) and Description (Options for meeting the standards for open molding operations at new or existing sources)

- m. The permit to Install for this air contaminant source takes into account the voluntary restriction of 7.3 tons VOC/yr, as proposed by the permittee for the purpose establishing requirements to avoid the Best Available Technology (BAT) requirements under OAC rule-3745-31-05(A)(3)(a), as effective 11/30/01, and for the purpose of establishing legally and practically enforceable limitations representing the potential to emit for VOC.
n. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become 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.

c) Operational Restrictions

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

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for the gelcoat operation:
a. The company identification of each gelcoat employed;
b. The amount of each gelcoat employed, in pounds;
c. The OC/VOC content, in percent by weight, for each gelcoat employed;
d. The OC/VOC emission rate from each gelcoat employed, in pounds per day [i.e., d)(1)b. x d)(1)c. x 0.75 lb OC/lb MMA or X lb (OC/VOC)/lb styrene, where X is calculated as specified for atomized spray gelcoat application under the Unified Emission Factors for Open Molding of Composites.];
e. The total OC/VOC emission rate from all gelcoats employed, in pounds per day [i.e., sum of d)(1)d.];
f. The total number of hours the emissions unit was in operation; and

g. The average hourly OC/VOC emission rate for all gelcoats employed [i.e., d)(1)e./d)(1)f] in lbs/hr.

(2) The permittee shall comply with the applicable monitoring and recordkeeping requirements under OAC rule 3745-21-25:

OAC rule 3745-21-25(O)(1) and (O)(2)	Demonstration of continuous compliance and the associated monitoring and data collection requirements
OAC rule 3745-21-25(P)(1) and (P)(4)	Recordkeeping requirements

(3) 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

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

(5) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator.

(6) These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

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

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

- a. the date of the inspection;
- b. a description of each/any problem identified and the date it was corrected;



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- c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.
(9) These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
(10) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer=s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that contain the following information:
a. An identification of each day during which the average hourly OC emissions from the gelcoat materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day; and
b. An identification of each day during which the OC emissions from the gelcoat materials exceeded 40 lbs/day, and the actual OC emissions for each such day.

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

- (2) 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 by OAC rule 3745-21-25:

Table with 2 columns: OAC rule reference and Reporting requirements. Row 1: OAC rule 3745-21-25(Q)(1), (Q)(2), (Q)(3), (Q)(4) and (Q)(5) | Reporting requirements. Row 2: OAC rule 3745-21-25(S)(1) and (S)(2) | Requirements on applicability notification, permit application and testing notification

- (3) 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:

Table with 2 columns: CFR section and Reporting requirements. Row 1: 63.5905(a) and (b) | Notifications that must be submitted and when [63.5905(a) – See Table 13 of this subpart]. Row 2: 63.5910(a) – (d), (f) – (i) | Reports that must be submitted and when [63.5910(a) – See Table 14 of this subpart]



f) Testing Requirements

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

a. Emission Limitation: 7.3 tons OC/yr

Applicable Compliance Method:

The annual limitation was determined by multiplying the 40 lbs OC/day limitation by 365 days/yr, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the 40 lbs OC/day emission limitation, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitations: OC emissions shall not exceed 8 pounds per hour and 40 pounds per day

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section d)(1) of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

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

Table with 2 columns: Reference, Description. Rows include 63.5835(a) and (c) General compliance requirements, 63.5840 Testing and initial compliance requirements, 63.5860(a) Testing and initial compliance requirements, and 63.5900(a) - (c) Continuous compliance requirements.

g) Miscellaneous Requirements

(1) None.