State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
ASHTABULA COUNTY

Street Address:
122 S. Front Street
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 02-20534
Fac ID: 0204030456
DATE: 5/31/2005

Hadlock Plastics Corp.
Jerry Lillie
110 North Eagle St.
Geneva, OH 44041

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: **USEPA** **NEDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 5/31/2005**
Terms and Conditions	**Effective Date: 5/31/2005**

FINAL PERMIT TO INSTALL 02-20534

Application Number:	02-20534
Facility ID:	0204030456
Permit Fee:	**$200**
Name of Facility:	Hadlock Plastics Corp.
Person to Contact:	Jerry Lillie
Address:	110 North Eagle St. Geneva, OH 44041

Location of proposed air contaminant source(s) [emissions unit(s)]:
214 N. Cedar St.
Geneva, **Ohio**

Description of proposed emissions unit(s):
Resin Transfer Molding.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Joseph P. Koncelik

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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:

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

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. 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:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. 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 appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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.

iv. 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.

2. 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 appropriate Ohio EPA District Office or local air agency 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).

3. 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.

4. 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.

5. 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.

6. 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. 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.

7. 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 this Permit To Install.

8. 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.

9. Compliance Requirements

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

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

i. 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.

ii. 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.

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

iv. 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:

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

ii. 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.

10. Permit To Operate Application

a. If 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).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

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

2. 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 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 (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 appropriate Ohio EPA District Office or local air agency. 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., 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.)

3. 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.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete

within a reasonable time a continuing program of installation or modification. 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.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

6. 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.

7. 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).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
OC	7.3 from RTM process
OC	4.0 from cleanup

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

1. Table 15, below, shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply to this emissions unit.

Table 15 to Subpart WWWW of Part 63

-Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63 [As specified in Sec. 63.5925, the parts of the General Provisions which apply to you are shown in the following table:]

The general provisions reference. . .	That addresses. . .	And applies to subpart WWWW of part 63	Subject to the following additional information. . .
Sec. 63.1 (a)(1)	General applicability of the general provisions	Yes. . .	Additional terms defined in Subpart WWWW of Part 63, when overlap between parts A and WWWW of Part 63P occurs, Subpart WWWW of Part 63 takes precedence.
Sec. 63.1 (a) (2) - (4)	General applicability of the general provisions	Yes. . .	
Sec. 63.1 (a) (5)	reserved	No. . .	
Sec. 63.1 (a) (6)	General applicability of the general provisions	Yes. . .	
Sec. 63.1 (a) (7) - (9)	reserved	No. . .	
Sec. 63.1 (a) (10) - (14)	General applicability of the general provisions	Yes. . .	
Sec. 63.1 (b) (1)	Initial applicability determination	Yes. . .	Subpart WWWW of Part 63 clarifies the applicability of Sec.63.5780 and 63.5785.
Sec. 63.1 (b) (2)	reserved	No. . .	
Sec. 63.1 (b) (3)	Record of the applicability determination	Yes. . .	
Sec. 63.1 (c) (1)	Applicability of this part after a relevant standard has been set under this part	Yes. . .	Subpart WWWW of Part 63 clarifies the applicability of each paragraph of Subpart A to sources subject to Subpart WWWW of Part 63.

Sec. 63.1 (c) (2)	Title V operating permit requirement	Yes. . .	All major affected sources are required to obtain a Title V operating permit. Area sources are not subject to Subpart WWWW of Part 63.
Sec. 63.1 (c) (3) and (4)	reserved	No. . .	
Sec. 63.1 (c) (5)	Notification requirements for an area source that increases HAP emissions to major source levels.	Yes. . .	
Sec. 63.1 (d)	reserved	No. . .	
Sec. 63.1 (e)	Applicability of a permit program before a relevant standard has been set under this part.	Yes. . .	
Sec. 63.2	Definitions	Yes. . .	Subpart WWWW of Part 63 defines terms in Sec. 63.5935. When overlap between Subparts A and WWWW of Part 63 occurs, you must comply with the Subpart WWWW of Part 63 definitions, which take precedence over the Subpart A definitions.
Sec. 63.3	Units and abbreviations	Yes. . .	Other units and abbreviations used in Subpart WWWW of Part 63 are defined in Subpart WWWW of Part 63.
Sec. 63.4	Prohibited activities and circumvention	Yes. . .	Sec. 63.4 (a)(3) through (5) is reserved and does not apply.
Sec. 63.5 (a) (1) and (2)	Applicability of construction and reconstruction.	Yes. . .	Existing facilities do not become reconstructed under Subpart WWWW of Part 63.
Sec. 63.5 (b) (1)	Relevant standards for new sources upon construction.	Yes. . .	Existing facilities do not become reconstructed under Subpart WWWW of Part 63.
Sec. 63.5 (b) (2)	reserved	No. . .	
Sec. 63.5 (b) (3)	New construction/reconstruction	Yes. . .	Existing facilities do not become reconstructed under Subpart WWWW of Part 63.
Sec. 63.5 (b) (4)	Construction/reconstruction notification	Yes. . .	Existing facilities do not become reconstructed under Subpart WWWW of Part 63.
Sec. 63.5 (b) (5)	reserved	No. . .	
Sec. 63.5 (b) (6)	Equipment addition or process change.	Yes. . .	Existing facilities do not become reconstructed under Subpart WWWW of Part 63.
Sec. 63.5 (c)	reserved	No. . .	

Sec. 63.5 (d) (1)	General application for approval of construction or reconstruction.	Yes. . .	Existing facilities do not become reconstructed under Subpart WWWW of Part 63.
Sec. 63.5 (d) (2)	Application for approval of construction	Yes. . .	
Sec. 63.5 (d) (3)	Application for approval of reconstruction	No. . .	
Sec. 63.5 (d) (4)	Additional information	Yes. . .	
Sec. 63.5 (e) (1) - (5)	Approval of construction or reconstruction	Yes. . .	
Sec. 63.5 (f) (1) and (2)	Approval of construction or reconstruction based upon prior State preconstruction review.	Yes. . .	
Sec. 63.6 (a) (1)	Applicability of compliance with standards and maintenance requirements.	Yes. . .	
Sec. 63.6 (a) (2)	Applicability of area sources that increase HAP emissions to become major sources.	Yes. . .	
Sec. 63.6 (b) (1) - (5)	Compliance dates for new and reconstructed sources.	Yes. . .	Subpart WWWW of Part 63 clarifies compliance dates in Sec. 63.5800.
Sec. 63.6 (b) (6)	reserved	No. . .	
Sec. 63.6 (b) (7)	Compliance dates for new operations or equipment that cause an area source to become a major source.	Yes. . .	New operations at an existing facility are not subject to new source standards.
Sec. 63.6 (c) (1) and (2)	Compliance dates for existing sources.	Yes. . .	Subpart WWWW of Part 63 clarifies compliance dates in Sec. 63.5800.
Sec. 63.6 (c) (3) and (4)	reserved	No. . .	
Sec. 63.6 (c) (5)	Compliance dates for existing area sources that become major.	Yes.. . .	Subpart WWWW of Part 63 clarifies compliance dates in Sec. 63.5800.
Sec. 63.6 (d)	reserved	No. . .	
Sec. 63.6 (e) (1) and (2)	Operation & Maintenance requirements	Yes. . .	
Sec. 63.6 (e) (3)	Startup, shutdown and malfunction plan and record keeping	Yes. . .	Subpart WWWW of Part 63 requires a startup, shutdown and malfunction plan only for sources using add-on controls.
Sec. 63.6 (f) (1)	Compliance except for periods of startup, shutdown and malfunction.	No. . .	Subpart WWWW of Part 63 requires compliance during periods of startup, shutdown and malfunction except startup, shutdown and malfunctions for sources using add-on controls.
Sec. 63.6 (f) (2) and (3)	Methods for determining compliance.	Yes. . .	

Sec. 63.6 (g) (1) - (3)	Alternative standard.	Yes. . .	
Sec. 63.6 (h)	Opacity and visible emission Standards.	No. . .	Subpart WWWW of Part 63 does not contain opacity or visible emission standards.
Sec. 63.6 (i) (1) - (14)	Compliance extensions	Yes. . .	
Sec. 63.6 (i) (15)	reserved	No. . .	
Sec. 63.6 (i) (16)	Compliance exemption	Yes. . .	
Sec. 63.6 (j)	Presidential compliance exemption	Yes	
Sec. 63.7 (a) (1)	Applicability of performance testing requirements	Yes.	
Sec. 63.7 (a) (2)	Performance test dates	No.	Subpart WWWW of Part 63 initial compliance requirements are in Sec. 63.5840.
Sec. 63.7 (a) (3)	CAA Section 114 authority	Yes.	
Sec. 63.7 (b) (1)	Notification of performance test	Yes.	
Sec. 63.7 (b)(2)	Notification rescheduled performance test	Yes.	
Sec. 63.7 (c)	Quality assurance program, including test plan.	Yes.	Except that the test plan must be submitted with the notification of the performance test.
Sec. 63.7 (d)	Performance testing facilities	Yes.	
Sec. 63.7 (e)	Conditions for conducting performance tests	Yes	Performance test requirements are contained in Sec. 63.5850. Additional requirements for performing compliance tests for continuous lamination/casting are included in Sec. 63.5870.
Sec. 63.7 (f)	Use of alternative test method.	Yes.	
Sec. 63.7 (g)	Performance test data analysis, record keeping, and reporting.	Yes.	
Sec. 63.7 (h)	Waiver of performance tests	Yes	
Sec. 63.8 (a) (1) and (2)	Applicability of monitoring requirements	Yes.	
Sec. 63.8 (a) (3)	reserved	No	
Sec. 63.8 (a) (4)	Monitoring requirements when using flares	Yes	
Sec. 63.8 (b) (1)	Conduct of monitoring exceptions	Yes	
Sec. 63.8 (b) (2) and (3)	Multiple effluents and multiple monitoring systems	Yes	

Sec 63.8 (c) (1)	Compliance with CMS operation and maintenance requirements	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8 (c) (2) and (3)	Monitoring system installation	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8 (c) (4)	CMS requirements.	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8 (c) (5)	Continuous opacity monitoring systems (COMS) minimum procedures	No	Subpart WWWW of Part 63 does not contain opacity standards.
Sec. 63.8 (c) (6) - (8)	CMS calibration and periods CMS is out of control	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8 (d)	CMS quality control program, including test plan and all previous versions	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8 (e) (1)	Performance evaluation of CMS	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8 (e) (2)	Notification of performance evaluation	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8 (e) (3) and (4)	CMS requirements/alternatives	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8 (e) (5)(i)	Reporting performance evaluation results	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8 (e) (5) (ii)	Results of COMS evaluation	No	Subpart WWWW of Part 63 does not contain opacity standards
Sec. 63.8 (f) (1) - (3)	Use of an alternative monitoring method	Yes	
Sec. 63.8 (f) (4)	Request to use an alternative monitoring method	Yes	
Sec. 63.8 (f) (5)	Approval of request to use an alternative monitoring method	Yes	
Sec. 63.8 (f) (6)	Request for alternative to relative accuracy test and associated records.	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.8 (g) (1) - (5)	Data reduction	Yes	
Sec. 63.9 (a) (1) - (4)	Notification requirements and general information	Yes	

Sec. 63.9 (b) (1)	Initial notification applicability	Yes	
Sec. 63.9 (b) (2)	Notification for affected source with initial startup before effective date of standard	Yes	
Sec. 63.9 (b) (3)	reserved	No	
Sec. 63.9 (b) (4) (i)	Notification for a new or reconstructed major affected source with initial startup after effective date for which an application for approval of construction or reconstruction is required.	Yes	
Sec. 63.9 (b) (4) (ii) - (iv)	reserved	No	
Sec. 63.9 (b) (4) (v)	Notification for a new or reconstructed major affected source with initial startup after effective date for which an application for approval of construction or reconstruction is required.	Yes	Existing facilities do not become reconstructed under Subpart WWWW of Part 63.
Sec. 63.9 (b) (5)	Notification that you are subject to this subpart for new or reconstructed affected source with initial startup after effective date and for which an application for approval of construction or reconstruction is required.	Yes	Existing facilities do not become reconstructed under Subpart WWWW of Part 63.
Sec. 63.9 (c)	Request for extension compliance	Yes	
Sec. 63.9 (d)	Notification of special compliance requirements for new source.	Yes	
Sec. 63.9 (e)	Notification of performance test	Yes	
Sec. 63.9 (f)	Notification of opacity and visible emissions observations	No	Subpart WWWW of Part 63 does not contain opacity or visible emission standards
Sec. 63.9 (g) (1)	Additional notification requirements for sources using CMS.	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.9 (g) (2)	Notification of compliance with opacity emission standard.	No	Subpart WWWW of Part 63 does not contain opacity standards
Sec. 63.9 (g) (3)	Notification that criterion to continue use of alternative to relative accuracy testing has been exceeded.	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.9 (h) (1) - (3)	Notification of compliance status.	Yes	
Sec. 63.9 (h) (4)	reserved	No	
Sec. 63.9 (h) (5) and (6)	Notification of compliance status	Yes	
Sec. 63.9 (i)	Adjustment of submittal deadlines	Yes	
Sec. 63.9 (j)	Change in information provided	Yes	
Sec. 63.10 (a)	Applicability of record keeping and reporting	Yes	
Sec. 63.10 (b) (1)	Records retention	Yes	

Sec. 63.10 (b) (2) (i) - (v)	Records related to startup, shutdown and malfunction	Yes	Only applies to facilities that use an add-on control device
Sec. 63.10 (b) (2) (vi) - (xi)	CMS records, data on performance tests, CMS performance evaluations, measurements necessary to determine conditions of performance tests, and performance evaluations.	Yes	
Sec. 63.10 (b) (2) (xii)	Record of waiver of record keeping and reporting.	Yes	
Sec. 63.10 (b) (2) (xiii)	Record for alternative to the relative accuracy test	Yes	
Sec. 63.10 (b) (2) (xiv)	Records supporting initial notification and notification of compliance status.	Yes	
Sec. 63.10 (b) (3)	Records for applicability determinations	Yes	
Sec. 63.10 (c) (1)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.10 (c) (2) - (4)	reserved	No	
Sec. 63.10 (c) (5) - (8)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.10 (c) (9)	reserved	No	
Sec. 63.10 (c) (10) - (15)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
Sec. 63.10 (d) (1)	General reporting requirements	Yes	
Sec. 63.10 (d) (2)	Report of performance test results	Yes	
Sec. 63.10(d) (3)	Reporting results of opacity or visible emission observations	No	Subpart WWWW of Part 63 does not contain opacity or visible emission standards.
Sec. 63.10 (d) (4)	Progress reports as part of extension of compliance.	Yes	
Sec. 63.10(d) (5)	Startup, shutdown and malfunction reports	Yes	Only applies if you use add-on control device.
Sec. 63.10 (e) (1) - (3)	Additional reporting requirements for CEMS	Yes	This section applies if you have an add-on control device and elect to use a CEM to demonstrate continuous compliance with an emission limit.
Sec. 63.10 (e) (4)	Reporting COMS data	No	Subpart WWWW of Part 63 does not contain opacity standards.
Sec. 63.10 (f)	Waiver for record keeping or reporting	Yes	
Sec. 63.11	Control device requirements	Yes	Only applies if you elect to use a flare as a control device.
Sec. 63.12	State authority and delegations	Yes	

Sec. 63.13	Addresses of State air pollution control agencies and EPA Regional Offices	Yes	
Sec. 63.14	Incorporations by reference	Yes	
Sec. 63.15	Availability of information and confidentiality.	Yes	

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R002 - Resin Transfer Molding (RTM) and Cleanup	OAC rule 3745-31-05 (A)(3)	8 lbs Organic Compounds (OC) per hour, 40 lbs OC per day and 7.3 tons per year from RTM
[Note: RTM means a process for manufacturing composites whereby catalyzed resin is transferred or injected into a closed mold in which fiberglass reinforcement has been placed.]		667 lbs Organic Compounds (OC) per month and 4.0 tons per year from cleanup See A.II.1. Compliance with OAC rule 3745-31-05 (A)(3) includes compliance with 40 CFR 63, Subpart WWWW.
	OAC rule 3745-21-07 (G)(2)	The requirements established pursuant to OAC rule 3745-21-07 (G)(2) are equivalent to the requirements established pursuant to OAC rule 3745-31-05 (A)(3).
	40 CFR 63, Subpart WWWW	See A.I.2.a and A.II.1.

2. Additional Terms and Conditions

2.a The permittee must keep containers that store any HAP-containing materials closed or covered except during the additional or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety. HAP-containing materials storage means an ancillary process which involves keeping HAP-containing materials,

such as resins, gel coats, catalysts and monomers in containers or bulk storage tanks for any length of time. Containers may include small tanks, totes, vessels, and buckets.

II. Operational Restrictions

1. The only organic material employed for cleanup shall be acetone.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall collect the following records each day from the RTM process:

   a. the identification of each organic material employed;

   b. the OC content of each such material, in percent;

   c. the amount, in gallons, of each such organic material employed;

   d. the pounds of available OC, in pounds per day, calculated as (b) x (c);

   e. the pounds of OC emitted per day, calculated as (d) x (emission factor of 2%);

   f. the number of hours of operation; and

   g. the average hourly emissions, calculated as (e) / (f).

   [Note: Emission factor of 2% is taken from Table 5.2 from AP-42, Average Emission Estimation Equations by Process. On October 2, 2000, Mr. Keith Barnett from US EPA indicated this emissions factor is acceptable for closed molding processes. Also, 40 CFR 63.5799(a) states emissions factors from AP-42 may be used.]

2. The permittee shall collect the following records each month from cleanup operations:

   a. the identification of each organic material employed for cleanup;

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

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

   d. the emissions from cleanup, in pounds OC per month, calculated as (b) x (c) for each such material employed.

3. The permittee shall retain a copy of each notification and report submitted to comply with this permit and with 40 CFR 63, Subpart WWWW, including all documentation supporting any Initial

Notification or Notification of Compliance Status submitted according to 40 CFR 63.10(b)(2)(xiv).

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

IV. Reporting Requirements

1. The permittee shall submit written quarterly deviation (excursion) reports which include an identification of each hour during which the OC emissions from the RTM process exceeded 8.0 pounds and the actual OC emissions for each such hour.

2. The permittee shall submit written quarterly deviation (excursion) reports which include an identification of each day during which the OC emissions from the RTM process exceeded 40 pounds, and the actual OC emissions for each such day.

3. The permittee shall submit written quarterly deviation (excursion) reports which include an identification of each month during which the OC emissions from cleanup exceeded 667 pounds, and the actual OC emissions for each such day.

4. The permittee shall submit written quarterly deviation (excursion) reports which include an identification of each month an organic cleanup material other than acetone was employed. The report shall include an identification of any such material and the VOC or OC emissions generated from said cleanup material.

5. The permittee shall submit a notification of the actual date of startup of this emissions unit, delivered or postmarked within 15 calendar days after that date, as specified in 40 CFR 63.9 (b)(4)(v). If any information submitted in this notification or contained in the application for Permit to Install is changed, the permittee must submit the changes in writing to the Director within 15 calendar days after the change.

6. The permittee must submit a compliance report. The report must contain a statement that there were no deviations during that reporting period if there were no deviations from the work practice standards as specified in A.I.2.a. and A.II.1. of this permit. The report must be submitted

semiannually according to the requirements in 40 CFR 63.5910(b).

a. The first compliance report must cover the period beginning upon startup of this emissions unit and ending on June 30 or December 31, whichever date occurs first following startup of this e missions unit. The first compliance report must be postmarked no later than July 31 or January 31, whichever date occurs first after startup of this emissions unit.

b. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. Each subsequent compliance report must be postmarked no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

7. The compliance report specified in A.IV.6. must contain the following information:

   a. company name and address;

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

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

   d. if there were no deviations from the work practice standards as specified in A.I.2.a. and A.II.1., a statement that there were no deviations from the work practice standards during the reporting period; or

   e. for each deviation from the work practice standards as specified in A.I.2.a. and A.II.1., the compliance report must contain the following information:

      i. the total operating time of the emissions unit during the reporting period; and

      ii. information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

8. The permittee must submit all deviations from the work practice standards as specified in A.I.2.a. and A.II.1., in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If the permittee submits the compliance report as specified in A.IV.6 and A.IV.7. along with or as part of the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A)and the compliance report contains all required information, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the permittee may have to report deviations from permit requirements to the Ohio EPA, Northeast District Office.

9. Submit compliance reports based upon the requirements in this permit and in 40 CFR Part 63, Subpart WWWW and not based upon the requirements in 40 CFR 63.999.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

   a. Emission Limitation:

8 lbs OC per hour from the RTM process

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in A.III.1.g.

b. Emission Limitation:
40 lbs OC per day from the RTM process

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in A.III.1.d.

c. Emission Limitation:
7.3 tons OC per year from the RTM process

Applicable Compliance Method:
Compliance shall be based upon summing the calculated daily emissions, based upon the record keeping specified in A.III.1.d.

d. Emission Limitation:
667 lbs OC per month from cleanup

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in A.III.2.d.

e. Emission Limitation:
4.0 tons OC per year from cleanup

Applicable Compliance Method:
Compliance shall be determined by summing the calculated monthly emissions as specified in A.III.2.d.

VI. Miscellaneous Requirements

None

Emissions Unit ID: R002

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R002 - Resin Transfer Molding and Cleanup		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None