Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

4/19/2011

Certified Mail

Facility ID: 1431404135
Permit Number: P0107252
County: Hamilton

Mr. Rob Clair
Nisbet-Brower Marble, LLC
10801 Reading Rd
Cincinnati, OH 45241

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this Title V permit is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Hamilton County Dept. of Environmental Services. 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.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Hamilton County Dept. of Environmental Services

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Title V Permit
for
Nisbet-Brower Marble, LLC

Facility ID:	1431404135
Permit Number:	P0107252
Permit Type:	Renewal
Issued:	4/19/2011
Effective:	5/10/2011
Expiration:	5/10/2016

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Nisbet-Brower Marble, LLC

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Authorization

Facility ID: 1431404135
Facility Description: Manufacturer of cast polymer products
Application Number(s): A0039903
Permit Number: P0107252
Permit Description: Renewal Title V permit for a cast polymer products operation, which includes one marble casting and solid surface casting process operation and two gel coat spray booth operations.
Permit Type: Renewal
Issue Date: 4/19/2011
Effective Date: 5/10/2011
Expiration Date: 5/10/2016
Superseded Permit Number: P0100093

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

Nisbet-Brower Marble, LLC
10801 Reading Rd.
Cincinnati, OH 45241-2533

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

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Hamilton County Dept. of Environmental Services. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

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

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

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

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

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

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

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

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

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

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

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

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

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

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

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

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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

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

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

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

(4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

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

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Hamilton County Dept. of Environmental Services.

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

3. Scheduled Maintenance

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

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

4. Risk Management Plans

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

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

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

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

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

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

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

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

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

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

8. Fees

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

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

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

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

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

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

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

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

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

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

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

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

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

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

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

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

15. Operational Flexibility

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

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

16. Emergencies

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

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

17. Off-Permit Changes

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

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that

qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

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

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

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

23. Title VI Provisions

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

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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

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

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

25. Records Retention Requirements Under State Law Only

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

26. Inspections and Information Requests

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

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

27. Scheduled Maintenance/Malfunction Reporting

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

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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

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

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

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

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

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

B. Facility-Wide Terms and Conditions

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

   a) None.

C. Emissions Unit Terms and Conditions

1. P001, Closed Molding Casting

Operations, Property and/or Equipment Description:

Closed Molding/Casting Operation

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) See d)(3) and d)(4).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05369 issued 6/17/2003)	Organic compound (OC) emissions shall not exceed 6.06 pounds per hour and 40 pounds per day from coating materials (resins). OC emissions shall not exceed 974.6 pounds per month from cleanup materials. OC emissions shall not exceed 7.3 tons per year (TPY) from coating materials (resin). OC emissions shall not exceed 5.85 TPY from cleanup materials. See c)(1) through c)(4).
b.	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are the same as or less stringent then the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See b)(2)a.
c.	OAC rule 3745-31-28	The requirements of this rule are satisfied by the requirements established in accordance with OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. 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.

c) Operational Restrictions

(1) The maximum amount of all cleanup material employed in this emissions unit shall not exceed 110 gallons per month and 1320 gallons per year.

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

(2) The maximum OC content of the cleanup material employed in this emissions unit shall not exceed 8.86 pounds of OC per gallon of cleanup material.

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

(3) The permittee shall not employ any photochemically reactive cleanup material, as defined in OAC rule 3745-21-01, in this emissions unit.

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

(4) The styrene content of the resins employed in this emissions unit shall not exceed 32%, by weight, for marble casting and 36.5 %, by weight, for solid surface casting.

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information on a daily basis for each day this emissions unit is in operation:

a. the company identification for each resin employed;

b. the type of casting process the resin was employed in (marble or solid surface);

c. the amount of each resin employed, in pounds;

d. the styrene content, as applied, of each resin employed, in percent, by weight;

e. the total daily organic compound emissions from resins employed (the summation of the resin usage values recorded in d)(1)c. multiplied by the styrene content recorded in d)(1) multiplied by an emission factor of 0.015* for each resin employed);

f. the total number of hours the emissions unit was in operation during the day;

g. the average hourly organic compound emissions from resins employed (the total daily OC emission rate calculated in d)(1)e. divided by the number of hours the emission unit was in operation recorded in d)(1)f.; and

h. the year-to-date OC emission totals, in tons (the summation of the daily OC emission totals in d)(1)e. divided by 2000 pounds/ton).

*The emission factor of 0.015 pound styrene emissions per pound of styrene employed is based on a guidance document from the Composite Fabrication Association, dated August 2, 2001.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3),and 3745-21-07(G)(2)]

(2) The permittee shall collect and record the following information on a monthly basis for cleanup materials employed in this emission unit:

a. the company identification for each cleanup material employed;

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

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

d. the total monthly OC emissions from cleanup materials employed, in pounds or tons (the summation of the cleanup material usage values recorded in d)(2)b. multiplied by the OC content recorded in d)(2)c. for each cleanup material employed);

e. the number of gallons of cleanup materials employed year-to-date (the summation of the monthly usage totals recorded in d)(2)b. through the end of the current month);

f. the OC emissions from cleanup materials employed year-to-date, in pounds or tons (the summation of the monthly emission totals recorded in d)(2)d. through the end of the current month); and

g. documentation on whether each cleanup material is a photochemically reactive material as defined in OAC rule 3745-21-01.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-21-07(G)(2)]

(3) The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's “Review of New Sources of Air Toxic Emissions” policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the

Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (mg/m3): 85,200

Maximum Hourly Emission Rate (lbs/hr): 6.06

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,449.7

MAGLC (ug/m3): 2,028

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

(4) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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

(5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install PTI 14-05369: d)(1) through d)(4). The monitoring and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. monthly cleanup material usage restriction;

b. annual cleanup material usage restriction;

c. OC content limitation for the cleanup material;

d. monthly OC emission limitation for the cleanup material;

e. annual OC emission limitation for the cleanup material;

f. hourly OC emission limitation for coatings(resins);

g. daily OC emission limitation for coatings(resins);

h. annual OC emission limitation for coatings; and

i. styrene content restrictions for resins.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-21-07(G)(2)].

(2) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install PTI 14-05369: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the emission limitations and material usage restrictions specified in b) and c) shall be determined by the following methods:

a. Emission Limitations:

OC emissions shall not exceed 6.06 pounds per hour from coatings (resin).

OC emissions shall not exceed 40 pounds per day from coatings (resin).

OC emissions shall not exceed 7.3 tons per year (TPY).

The styrene content of the resins employed in this emissions unit shall not exceed 32%, by weight, for marble casting and 36.5 %, by weight, for solid surface casting.

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 – 4, 18 and 25.

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

Compliance with the annual OC emission limitation shall be determined by the record keeping requirements specified in d)(1).

Compliance with the styrene content limitations shall be determined by the record keeping requirements specified in d)(1).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-21-07(G)(2)].

b. Emission Limitations:

OC emissions shall not exceed 974.6 pounds per month from cleanup material.

OC emissions shall not exceed 5.85 tons per year from cleanup material.

Applicable Compliance Method:

Compliance with the monthly OC emission limitation shall be determined by the record keeping requirements specified in d)(2).

Compliance with the annual OC emission limitation shall be determined by the record keeping requirements specified in d)(2).

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

c. Emission Limitation:

The maximum OC content of the cleanup material employed in this emissions unit shall not exceed 8.86 pounds of OC per gallon of cleanup material.

Applicable Compliance Method:

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

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

d. Material Usage Restrictions:

The maximum amount of all cleanup material employed in this emissions unit shall not exceed 110 gallons per month and 1320 gallons per year.

Non-photochemically reactive cleanup materials shall be employed.

Applicable Compliance Method:

Compliance with the monthly cleanup material usage and content restrictions shall be determined by the record keeping requirements specified in d)(2).

Compliance with the annual cleanup material usage restriction shall be determined by the recordkeeping requirements specified in d)(2).

Compliance with the non-photochemically reactive cleanup material limitations shall be employed shall be determined by the recordkeeping requirements specified in d)(2).

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

(2) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install PTI 14-05369: f)(1)a. through f)(1)d. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group - Gel Coat Booths

EU ID	Operations, Property and/or Equipment Description
R001	Gel Coat Booth 1
R002	Gel Coat Booth 2

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

(1) See d)(7) and d)(8).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05369 issued 6/17/2003)	The Organic Compound (OC) emissions from resin application shall not exceed 5.52 pounds per hour and 40 lbs/day. OC emissions shall not exceed 178 pounds per month from cleanup materials. OC emissions shall not exceed 0.86 ton per year from cleanup materials. OC emissions shall not exceed 7.3 tons per year from coating (gel coat) materials. Particulate emissions (PE) and Particulate matter with a diameter of 10 microns or less (PM-10) shall not exceed 0.551 pound per hour. PE/PM10 emissions shall not exceed 2.41 tons per year. The requirements of this rule also include compliance with the requirements of OAC rule and 3745-17-07(A)(1). See c)(1) - c)(4).

b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
c.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-11(C)(3)	The Permit to Install for this emissions unit was issued February 20, 2003 and modified on 6/17/2003 (post January 1, 1990). Therefore, the emissions unit is subject to the requirements of OAC rule 3745-17-11(C)(1) and (2) pursuant to OAC rule 3745-17-11(C)(3).
e.	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are the same as the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See b)(2)(c).
f.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935) [In accordance with 63.5805(b), this emissions unit is an open molding gel coating application at an existing reinforced plastic composites production facility subject to the emission limitations and work practices specified in 40 CFR 63.5805(b)]	Table 3 to 40 CFR Part 63, Subpart WWWW – Organic Hazardous Air Pollutant (HAP) Emission Limits for Specific Open Molding, Centrifugal Casting, Pultrusion, and Continuous Lamination/Casting Operations. See b)(2)a. and d. Table 4 to 40 CFR Part 63, Subpart WWWW – Applicable Work Practice Standards. See c)(5) and c)(6).
g.	40 CFR 63.1-15, Subpart A (40 CFR 63.5925)	Table 15 to 40 CFR Part 63, Subpart WWWW – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR Part 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. The following organic HAP emission limitations shall not be exceeded based on a 12-month rolling average.

Gel Coat Type	Organic HAP Emission Limit
Tooling gel coating	440 lbs/ton
White/off white pigmented gel coating	267 lbs/ton
All other pigmented gel coating	377 lbs/ton
CR/HS or high performance gel coating	605 lbs/ton
Fire retardant gel coat	854 lbs/ton
Clear Production gel coat	522 lbs/ton

b. 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. 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.

d. This emissions unit is subject to the requirements of 40 CFR Part 63 Subpart WWWW - National Emissions Standards for Hazardous Air Pollutants for Specific Open Molding, Centrifugal Casting, Pultrusion, and Continuous Lamination/Casting Operations. The permittee shall comply with the applicable emission limitations and operational restrictions specified in 40 CFR Part 63.5780 – 63.5930. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District Office or local air agency.

c) Operational Restrictions

(1) The maximum amount of all cleanup material employed in this emissions unit shall not exceed 27 gallons per month and 260 gallons per year.

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

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

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

(3) The permittee shall not employ any photochemically reactive cleanup material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1), 3745-31-05(A)(3) and 3745-21-07(G)(2)]

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

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

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

(5) The permittee shall employ only non-HAP-containing cleanup materials in each emissions unit, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart WWWW Table 4]

(6) The permittee shall keep containers that store HAP-containing coating materials and cleanup materials closed or covered, except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

[Authority for term: OAC rules 3745-77-07(A)(1) and 40 CFR Part 63, Subpart WWWW Table 4]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day this emissions unit is in operation:

a. company identification for each coating material (gel coat) and cleanup material applied;

b. number of pounds of each coating material (gel coat) applied;

c. the HAP content, recorded in percent by weight, of each coating material (gel coat) employed in this emissions unit;

d. calculated OC (assumed equal to the organic HAP) emission factor using the equations to calculate organic HAP emission factors from Table 1 of 40 CFR Part

63, Subpart WWWW, in pounds of OC per ton of coating material (gel coat) applied;

e. total daily OC emission rate for all coatings (gel coats) applied, in pounds per day [d)(1)b./2000 x d)(1)d.];

f. number of hours the emissions unit was in operation;

g. average hourly OC emission rate for all coatings (gel coats) applied, in pounds per hour [d)(1)e. divided by d)(1)f.];

h. total number of gallons of cleanup material applied;

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

j. daily OC emissions from the cleanup material employed, in pounds [d)(1)h. x d)(1)i.];

k. total PE/PM10 emission rate for all coatings employed, in pounds per day [summation of d)(1)b. x (1 - HAP content, percent by weight) x 0.25 (25% overspray) x (1 - 0.90, the control efficiency of the dry filtration system)]**;

l. average hourly PE/PM10 emission rate for all coatings employed, in pounds/hour [d)(1)k. divided by d)(1)f.];

m. a determination whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-05(C)(5); and

n. a determination whether or not each cleanup material employed is a non-HAP material, as identified in Section 112(b) of the Clean Air Act.

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

** The 25% overspray and 90% control efficiency were used to establish the PE/PM10 emission rates established in PTI 14-05369 and are based on conservative engineering assumptions.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-21-07(G)(2), and 40 CFR Part 63 Subpart WWWW]

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

a. total OC emissions from all the coatings (gel coat) employed, in tons [summation of d)(1)e. for all days of the calendar month, and divided by 2000 pounds per ton];

b. updated year to date summation of OC emission from all the coatings (gel coats) employed, in tons [this shall include the total for the current months OC emissions, plus the total for the preceding calendar months for the calendar year]; and

c. total PE/PM10 emissions for all coatings employed, in tons [summation of the data from d)(1)k. for all days of the calendar month divided by 2000 pounds per ton].

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

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

a. total number of gallons of cleanup material employed [summation of d)(1)h. for all days the emission unit was in operation during the month]; and

b. total OC emissions from cleanup materials employed, in pounds [summation of d)(1)j. for all days of the emission unit was in operation].

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

(4) The permittee shall utilize one or more compliance options, as specified in 40 CFR 63.5810 to demonstrate compliance with the emission standards for open molding in Table 3 of this subpart, as described in the following sections:

63.5810(a)	individual resin or gel coat compliance demonstration
63.5810(b)	average individual organic HAP emissions limit compliance demonstration for all operations and application methods
63.5810(c)	weighted average emission limit compliance demonstration
63.5810(d)	organic HAP emission limit compliance demonstration for one resin type and application method

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.5810]

(5) The permittee is currently demonstrating compliance through the option specified in 63.5810(a). The permittee shall comply with the following data collection, emission calculation, and record keeping requirements, in addition to those listed in d)(6) below:

a. Calculate your actual organic HAP emissions factor for each different process stream within this emission unit. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. You must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 of 40 CFR Part 63 Subpart WWWW for open molding and for centrifugal casting, or

site-specific organic HAP emissions factors discussed in §63.5796. The emission factor calculation should include any and all emission reduction techniques used. If you are using vapor suppressants to reduce HAP emissions, you must determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in appendix A to subpart WWWW of 40 CFR part 63.

Should the permittee choose to demonstrate compliance with the emission limitations listed in b)(2)a. by one of the alternative compliance demonstrations specified in d)(6), the permittee shall collect and record the information specified in 40 CFR 63.5810(b),(c), or (d), as appropriate.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.5810]

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

63.5895(c) - (d)	records of resin and gel coat use, organic HAP content, operation and application method(s)
63.5915(a)	copy of compliance notification(s) and report(s)
63.5915(c)	records of all calculations and data used to determine organic HAP emissions factors or average organic HAP contents for operations and application methods as specified under 63.5810
63.5915(d)	certified statement of compliance with work practice requirements
63.5920(a) – (d)	record keeping format and retention requirements

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

(7) The permit to install for emissions units R001 and R002 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's “Review of New Sources of Air Toxic Emissions” policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the “worst case” pollutant(s):

Pollutant: Styrene

TLV (mg/m3): 85,200

Maximum Hourly Emission Rate (lbs/hr): 5.52

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 227.4

MAGLC (ug/m3): 2028

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the “Air Toxic Policy” is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the “Air Toxic Policy” will still be satisfied. If, upon evaluation, the permittee determines that the “Air Toxic Policy” will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the “Air Toxic Policy” include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

(8) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the “Air Toxic Policy:”

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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

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

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

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

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

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

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

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

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

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

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

(13) 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.

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

(14) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping contained in Permit to Install PTI 14-05369: d)(1) through d)(13). The monitoring and recordkeeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. monthly cleanup material usage restriction;

b. OC content limitation for the cleanup material;

c. daily OC emission limitation for the cleanup material;

d. hourly OC emission limitation for coatings;

e. daily OC emission limitation for coatings;

f. hourly PE/PM10 emission limitation;

g. annual PE/PM10 emission limitation; and

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3) and 3745-21-07(G)(2)].

(2) The permittee shall submit annual reports to the Hamilton County Department of Environmental Services that specify the following:

a. total amount, in gallons, of cleanup material employed for the calendar year;

b. total OC emissions from the cleanup material employed, in tons, for the calendar year; and

c. OC emissions from emissions units R001 and R002, combined, for each calendar month.

This report shall be submitted by January 31 of each year and cover the previous calendar year.

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

(3) The permittee shall notify the Hamilton County Department of Environmental Services in writing of each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

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

(4) Upon replacement and/or initial operation of any metering or measuring equipment as specified in d)(4) and d)(5) of this permit, the permittee shall provide the Hamilton County Department of Environmental Services the following information: the name of the manufacturer of the metering/measuring equipment, the make and model of the metering/measuring equipment, calibration data (e.g., volume of coating per pump stroke), a copy of the manufacturer's specifications and warranty for the accuracy of the metering/measuring equipment and the actual accuracy of the material measurements (by weight or by volume) recorded for the metering/measuring equipment.

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

(5) The permittee shall submit calibration and accuracy test results for the metering equipment and measuring equipment specified in d)(4) and d)(5) of the terms and conditions of this permit. The calibration and accuracy tests results shall be submitted to the Hamilton County Department of Environmental Services by January 30 and July 30 of each calendar year, and shall cover the previous six-month period.

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

(6) The permittee shall submit semi-annual reports and such other notifications and reports to the Hamilton County Department of Environmental Services as are required in 40 CFR Part 63, Subpart WWWW, pursuant to the following sections:

63.5905(b)	15-day notification of change(s)
63.5910(a) - (b) and Table 14	semi-annual compliance reports
63.5910(c) - (i) and Table 14	content of semi-annual compliance reports

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

(7) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install PTI 14-05369: e)(1) through e)(6). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this

operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the emission limitations and material usage restrictions specified in b) and c) shall be determined by the following methods:

a. Emission Limitations:

OC emissions shall not exceed 5.52 pounds per hour from coatings (resin and gel coat).

OC emissions shall not exceed 40 pounds per day from coatings (resin and gel coat).

OC emissions shall not exceed 7.3 tons per year (TPY) from coatings (gel coats).

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 – 4, 18 and 25.

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

Compliance with the annual OC emission limitation shall be determined by the record keeping requirements specified in d)(2).

[Authority for term: OAC rules 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 3745-21-07(G)(2)].

b. Emission Limitations:

OC emissions shall not exceed 178 pounds per month from cleanup materials

OC emissions shall not exceed 0.86 ton per year from cleanup materials

Applicable Compliance Method:

Compliance with the monthly OC emission limitation from cleanup materials shall be determined by the record keeping requirements specified in d)(2).

Compliance with the annual OC emission limitation from cleanup material shall be determined by the record keeping requirements specified in d)(3).

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

c. Emission Limitation:

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

Applicable Compliance Method:

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

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

d. Material Usage Restriction:

The maximum amount of all cleanup material employed in this emissions unit shall not exceed 27 gallons per month and 260 gallons per year.

Applicable Compliance Method:

Compliance with the monthly cleanup material usage restriction shall be determined by the record keeping requirements specified in d)(3).

Compliance with the annual cleanup material usage restriction shall be determined by the recordkeeping requirements specified in d)(3).

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

e. Emission Limitation:

See the organic HAP emission limitations noted in b)(2)a.

Applicable Compliance Method:

Compliance with the organic HAP emission limitation shall be based upon the information collected and recorded in d)(4) - d)(6) of this permit.

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

f. Emission Limitations:

PE/PM-10 emissions shall not exceed 0.551 pound per hour;

PE/PM-10 emissions shall not exceed 2.41 tons per year.

Applicable Compliance Method:

Compliance with the hourly PE/PM10 emission limitation shall be determined by the record keeping requirements specified in d)(1).

If required, the permittee shall demonstrate compliance with the hourly PE/PM10 emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1-5.

Compliance with the annual PE/PM10 emission limitation shall be determined by the record keeping requirements specified in d)(2).

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

(2) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install PTI 14-05369: f)(1)a. through f)(1)f. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.