



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

7/28/2011

Certified Mail

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

MIKE DOBRONOS
ARCHITECTURAL FIBERGLASS INC.
8300 BESSEMER AVE.
CLEVELAND, OH 44127-1839

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1318008262
Permit Number: P0107924
Permit Type: OAC Chapter 3745-31 Modification
County: Cuyahoga

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains 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 PTI 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 Cleveland Division of Air Quality. 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, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
CDAQ; Pennsylvania; Canada



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
ARCHITECTURAL FIBERGLASS INC.**

Facility ID: 1318008262
Permit Number: P0107924
Permit Type: OAC Chapter 3745-31 Modification
Issued: 7/28/2011
Effective: 7/28/2011



Division of Air Pollution Control
Permit-to-Install
for
ARCHITECTURAL FIBERGLASS INC.

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Authorization

Facility ID: 1318008262

Facility Description: Manufacturer of reinforced plastic composite parts.

Application Number(s): A0041892, A0042050, A0042051

Permit Number: P0107924

Permit Description: Chapter 31 modification of PTI 13-3709 issued 3/15/2001, to increase potential to emit at this reinforced plastic composites (RPC) production facility for three spray booths (K001 - K003). Architectural Fiberglass will be a major HAP source subject to Title V permitting, 40 CFR 63 Subpart WWWW (RPC MACT) and OAC 3745-21-25 (OH RPC RACT). The facility has requested a voluntary VOC limit across all permitted units of 49 tons per rolling 12 months, to ensure that the facility will remain minor for VOC even if NE Ohio were to be reclassified as Serious Ozone Non-attainment.

Permit Type: OAC Chapter 3745-31 Modification

Permit Fee: \$600.00

Issue Date: 7/28/2011

Effective Date: 7/28/2011

This document constitutes issuance to:
ARCHITECTURAL FIBERGLASS INC.
8300 BESSEMER AVE
Cleveland, OH 44127-1839

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:
Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0107924

Permit Description: Chapter 31 modification of PTI 13-3709 issued 3/15/2001, to increase potential to emit at this reinforced plastic composites (RPC) production facility for three spray booths (K001 - K003). Architectural Fiberglass will be a major HAP source subject to Title V permitting, 40 CFR 63 Subpart WWWW (RPC MACT) and OAC 3745-21-25 (OH RPC RACT). The facility has requested a voluntary VOC limit across all permitted units of 49 tons per rolling 12 months, to ensure that the facility will remain minor for VOC even if NE Ohio were to be reclassified as Serious Ozone Non-attainment.

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

Group Name: Resin/Gelcoat Spray booths

Emissions Unit ID:	K001
Company Equipment ID:	Booth 1
Superseded Permit Number:	13-03709
General Permit Category andType:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Booth 2
Superseded Permit Number:	13-03709
General Permit Category andType:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	Booth 3
Superseded Permit Number:	13-03709
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

2. Severability Clause

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

3. General Requirements

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

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

4. Monitoring and Related Record Keeping and Reporting Requirements

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

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

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

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Cleveland Division of Air Quality.
- 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 Cleveland Division of Air Quality. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

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

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

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

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

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

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

16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

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. Emissions Unit Group -Resin/Gelcoat Spray booths: K001, K002, K003,

EU ID	Operations, Property and/or Equipment Description
K001	Polyester gelcoat and FRP (fiberglass reinforced plastic parts) spray up booth.
K002	Polyester gelcoat and FRP (fiberglass reinforced plastic parts) spray up booth.
K003	Polyester gelcoat and FRP (fiberglass reinforced plastic parts) spray up booth.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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(E)	Volatile organic compound (VOC) emissions, excluding cleanup, shall not exceed 49 TPY on a rolling, 12-month period facility-wide. See b)(2)a. and b)(2)b. below.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-11 (B)	a) PE shall not exceed 0.551 lb/hr.
d.	OAC rule 3745-21-25	The requirements of this rule are equivalent to the MACT requirements in 40 CFR Part 63, Subpart WWWW. See b)(2)b. below.
e.	ORC 3704.03(T)	The requirements of this rule are equivalent to the MACT requirements in 40 CFR Part 63, Subpart WWWW.
f.	40 CFR Part 63, Subpart WWWW	Organic hazardous air pollutants (Organic HAP) shall not exceed emissions standards as specified in 40 CFR 63.5805, Subpart WWWW. See b)(2)a., b)(2)c., and b)(2)d. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935) [This emissions unit is an open molding resin/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. Table 4 to 40 CFR Part 63, Subpart WWWW – Applicable Work Practice Standards.
h.	40 CFR Part 63.1 through 63.15, Subpart A	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

- a. The emissions of organic material from the resin/gel coat spray gun operation consist of styrene and methyl methacrylate, both photochemically reactive materials and hazardous air pollutants (HAP).
- b. The following is the list of emissions units at the facility that are subject to the facility-wide emission limitation for VOC: K001, K002, K003, and P002.
- c. In accordance with paragraph (A)(1) of OAC rule 3745-21-25, this facility is subject to requirements of OAC rule 3745-21-25. This emissions unit was installed prior to the effective date of the rule and must comply with the requirements of this rule 12 months from the effective date of the rule, which was December 14, 2010.

In accordance with paragraph (A)(3) of OAC rule 3745-21-25, upon achieving compliance with this rule, the reinforced plastic composites production operations at the facility are not required to meet the February 18, 2008 revision of OAC rule 3745-21-07.

- d. The following organic HAP emission limitations are potentially applicable to this emission unit, based on application technique and material properties, as specified in Table 3 of 40 CFR 63 Subpart WWWW and shall not be exceeded, based on compliance option selected in d)(3):

Open Molding Gel Coat/Resin Type	HAP Emission Limit
Tooling – mechanical resin application	254 lb/ton
Tooling – manual resin application	157 lb/ton
Low flame spread – mechanical application	497 lb/ton
Low flame spread – manual application	238 lb/ton
Shrinkage-controlled resins – mechanical application	354 lb/ton

Shrinkage-controlled resins – manual application	180 lb/ton
Corrosion resistant or high strength resin – mechanical application	113 lb/ton
Corrosion resistant or high strength resin – manual application	123 lb/ton
Other resins – mechanical application	88 lb/ton
Other resins – manual application	87 lb/ton
Gel coat - tooling	440 lb/ton
Gel coat – white/off white pigmented	267 lb/ton
Gel coat – other pigmented	377 lb/ton
Gel coat – clear production	522 lb/ton
Gel coat – corrosion resistant or high strength	605 lb/ton
gel coat – fire retardant	854 lb/ton

- e. 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 Cleveland Division of Air Quality (Cleveland DAQ).
- f. The permittee shall only employ non-VOC based cleanup materials. No cleanup materials with VOC, as defined in OAC rule 3745-21-01, shall be employed.

c) Operational Restrictions

- (1) The maximum amount of VOC facility emissions from application of resins and/or gelcoat shall not exceed 49 TPY facility-wide, on a rolling, 12-month summation for the emission units listed in b)(2)b.

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

- (2) 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)]

- (3) 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 for each month for emissions units K001, K002 and K003:
- a. the company identification for each resin and gel coat employed;
 - b. the amount, in pounds, of each resin and gel coat employed;
 - c. the HAP content of each resin and gel coat, in percent by weight;
 - d. the product specific HAP emission factor in lb/ton resin or gel coat applied, calculated using the equations in Table 1 of 40 CFR 63 Subpart WWWW for determining coating compliance with Table 3 of the rule;
 - e. the total monthly VOC emission rate for all coatings (resins and/or gel coats) applied, in pounds per month using the most appropriate emission factor from Table 1 of 40 CFR 63 Subpart WWWW or the most recent update of the Unified Emission Factors (UEF) for Open Molding of Composites, July 23, 2001, [(d)(1)b x d)(1)d)/2000]]; and
 - f. the rolling, 12-month summation of VOC emission from all the coatings (resins and/or gel coats) employed, in tons for facility emission units as identified in b)(2)b. above [this shall include the total for the current month's VOC emissions, plus the total for the preceding eleven calendar months according to the formula in f)(1)b].

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

- (2) For the purpose of the annual fee emissions report, the permittee shall collect and record the following information for each year for the purpose of determining annual OC emissions from cleanup material:
- a. the volume of each cleanup material employed, in gallons per year;
 - b. the OC content of each cleanup material, in pounds per gallon; and
 - c. the total OC emission rate for all cleanup materials, in pounds [summation of d)(2)a. x d)(2)b.].

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-78-02]

- (3) 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 limit compliance demonstration for all organic HAP emissions 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]

- (4) The permittee is currently demonstrating compliance through 63.5810(c). Should the permittee choose to demonstrate compliance with the emission limitations listed in b)(2)d. by one of the alternative compliance demonstrations specified in d)(3), the permittee shall collect and record the information specified in 40 CFR 63.5810(a),(b), or (d), as appropriate.

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

- (5) 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]

- (6) 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)]

- (7) 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)]

- (8) 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)]

- (9) 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 Cleveland DAQ.

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

- (10) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Cleveland DAQ upon request.

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. each month when the VOC emissions exceeded the rolling tons per year limit for the facility in b)(1)a, and the actual VOC emissions for the facility for each such month; and

- b. 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 modification made by the permittee) when the emissions unit(s) was/were in operation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority of Term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), and OAC rule 3745-77-07(A)(3)(c)]

- (2) The permittee shall submit semi-annual reports and such other notifications and reports to the Cleveland Division of Air Quality 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]

- (3) The permittee must submit the following semiannual compliance reports:
 - a. if there are no deviations from the work practice standards in b)(1)g, provide a statement that there were no deviations from each of the those work practice standards during the reporting period; and
 - b. if there were deviations with the work practice standards in b(1)g, provide the total operating time of the emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each 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. These compliance reports shall be submitted to the Cleveland DAQ through the Ohio EPA eBusiness Center, Air Services by July 31 or January 31, respectively.

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

- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

f) Testing Requirements

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

a. Emission Limitation:

- 254 lb HAP/ton resin for mechanical application - tooling
- 157 lb HAP/ton resin for manual application -tooling
- 497 lb HAP/ton resin for mechanical application – low flame spread
- 238 lb HAP/ton resin for manual application – low flame spread
- 354 lb HAP/ton resin for mechanical application shrinkage-controlled
- 180 lb HAP/ton resin for manual application – shrinkage-controlled
- 113 lb HAP/ton resin for mechanical application for corrosion resistant/high strength
- 123 lb HAP/ton resin for manual application – corrosion resistant/high strength
- 88 lb HAP/ton resin for mechanical application – other resins
- 87 lb HAP/ton resin for manual application – other resins
- 440 lb HAP/ton gel coat - tooling
- 267 lb HAP/ton gel coat - white/off white pigmented
- 377 lb HAP/ton gel coat – other pigmented
- 522 lb HAP/ton gel coat – clear production
- 605 lb HAP/ton gel coat – corrosion resistant or high strength
- 854 lb HAP/ton gel coat - fire retardant

Applicable Compliance Method:

Compliance with the organic HAP emission limitation shall be based upon the information collected and recorded in d)(3) - d)(5) of this permit.

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

b. Emission Limitation:

Facility-side volatile organic compound (VOC) emissions shall not exceed 49 TPY, excluding cleanup, for emissions units listed in b)(2)b., as a rolling, 12-month summation.

Applicable Compliance Method:

To calculate emissions from lay-up operations, the permittee shall employ the following formula:

$$E (\text{application type}) = \sum (W_i \times EF_i) / (2000 \text{ lbs/ton})$$

Where:

E (application type) = the yearly VOC emissions from all materials (resins and gel coats), in tons per year;

i = subscript denoting a specific lay-up material (resin and gel coats application type) employed;

Wi = the weight of lay-up material (resin and gel coats) "i" employed, in tons per year (pounds per year divided by 2000 pounds per ton); and

EFi = the HAP (styrene plus MMA) emission factor in pounds per ton, from lay-up material (resins and gel coats); where, "EFi" = lbs styrene/ton. These emission factors are based on the styrene and MMA content of the resin or gel coat and the application type, as calculated according to the formula in 40 CFR 63 Subpart WWWW, Table 1, titled "Equations to Calculate Organic HAP Emission Factors for Specific Open Molding and Centrifugal Casting Process", dated Aug. 25, 2005 (for MACT limits only) or the most recent update of the Unified Emission Factors (UEF) for Open Molding of Composites, July 23, 2001.

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

c. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-17-03(B)(1)]

d. Emission Limitation:

0.551 lb/hr total PE

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the above hourly particulate emission limitation in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A. Alternatively, compliance may be determined according to the following formula:

Total PE, in pounds per day as the summation of d)(1)b. x (solids content, percent by weight) x 0.5 (5% overspray) x (1 - 0.99, the control efficiency of the dry filtration system)]

The average hourly PE emission rate for all coatings employed, in pounds/hour, determined from the above value divided by the actual hours of operation.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-17-11(B)]

- (2) Formulation data or U.S. EPA Method 24 shall be used to determine the styrene contents of all resins and gel coats, the methyl methacrylate content of all gel coats, and the VOC content of all cleanup material employed in this emissions unit.

g) Miscellaneous Requirements

- (1) None.