



Environmental Protection Agency

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

2/16/2012

Certified Mail

Doug Spangler
Core Molding Technologies
800 Manor Park Drive
Columbus, OH 43228

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0125041046
Permit Number: P0109467
Permit Type: Initial Installation
County: Franklin

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

Dear Permit Holder:

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

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

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

Cc: U.S. EPA Region 5 - Via E-Mail Notification
Ohio EPA-CDO



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Core Molding Technologies (Core) has submitted a PTI application for a proposed new gel coating/molding operation identified as RTM Lite. The new line will include a gel coating booth (K001) controlled by particulate filters.

3. Facility Emissions and Attainment Status:

Core is a Title V source for VOCs. The primary VOC source for the facility is the SMC room which produces styrene used in the production of truck bodies. Actual facility emissions have consistently been below 100 ton/yr of VOCs. Franklin County is currently in attainment for ozone.

Core is subject to the requirements for the control of VOC emissions from reinforced plastic composites production operations contained in OAC rule 3745-21-25. OAC rule 3745-21-25 contains two sets of requirements based on a VOC emissions threshold of 100 ton/yr, calculated in accordance with the rule. Prior to installation of the RTM Lite line, Core's VOC emissions threshold was calculated at 34.43 ton/yr. Core has requested a synthetic minor restriction to stay below the 100 ton/yr threshold. By limiting the annual usage of gel coating to 200 ton/yr, Core's new VOC emissions threshold will be 72.01 ton/yr.

4. Source Emissions:

The RTM Lite Gel Coating Booth (K001) is a source of PE and VOC emissions.

Particulate Emissions

Hourly PE = coating usage x solids density x (1 - TE) x (1 - CE), where:

Maximum coating usage = 14.00 gal/hr

Maximum solids density of the coatings = 6.49 lb solids/gal coating

TE = transfer efficiency = 75%

CE = control efficiency of the particulate filter = 98.5%

Annual PE = coating usage x solids density x (1 - TE) x (1 - CE) / 2,000 lb/ton, where:

Maximum coating usage = 38,910 gal/yr (200 ton/yr x 2,000 lb/ton / 10.28 lb/gal)

Maximum solids density of the coatings = 6.49 lb solids/gal coating

TE = transfer efficiency = 75%

CE = control efficiency of the particulate filter = 98.5%

VOC Emissions

Annual VOC = coating usage x emissions factor / 2,000 lb/ton, where:

Maximum coating usage = 200 ton/yr

Emission factor = $(1.03646 \times \%HAP - 0.195) \times 2,000 = 376.98 \text{ lb HAP/ton}$

Styrene content (%HAP) = 36.943%

This emission factor is specified in Table 1 to 40 CFR Part 63, Subpart WWWW for atomized spray gel coat applications.

5. Conclusion:

The issuance of P0109467 is recommended.

6. Please provide additional notes or comments as necessary:

K001 is subject to the requirements of 40 CFR 63, Subpart WWWW. Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the compound that would be evaluated (styrene) is a regulated compound under the MACT standard, and compliance with the MACT standard is required under this permit.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	0.47
VOC	37.58

PUBLIC NOTICE
2/16/2012 Issuance of Draft Air Pollution Permit-To-Install

Core Molding Technologies
800 Manor Park,
Columbus, OH 43228-0183
Franklin County

FACILITY DESC.: Automobile Manufacturing

PERMIT #: P0109467

PERMIT TYPE: Initial Installation

PERMIT DESC: Initial installation for a gel coating booth. VOC/HAP emissions will be restricted to 37.58 tons per year by limiting the annual usage of coating.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Pamela McCoy, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778



DRAFT

Division of Air Pollution Control
Permit-to-Install
for
Core Molding Technologies

Facility ID:	0125041046
Permit Number:	P0109467
Permit Type:	Initial Installation
Issued:	2/16/2012
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Core Molding Technologies

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Authorization

Facility ID: 0125041046
Facility Description: Plastics products nec
Application Number(s): A0043533
Permit Number: P0109467
Permit Description: Initial installation for a gel coating booth. VOC/HAP emissions will be restricted to 37.58 tons per year by limiting the annual usage of coating.
Permit Type: nitial Installation
Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 2/16/2012
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Core Molding Technologies
800 Manor Park
Columbus, OH 43228-0183

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

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

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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: P0109467
Permit Description: Initial installation for a gel coating booth. VOC/HAP emissions will be restricted to 37.58 tons per year by limiting the annual usage of coating.

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

Emissions Unit ID:	K001
Company Equipment ID:	RTM Lite
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

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

2. Severability Clause

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

3. General Requirements

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

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

4. Monitoring and Related Record Keeping and Reporting Requirements

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

and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Central District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

- (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Central District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:



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

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Central District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a

quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

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

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

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

records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

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

14. Public Disclosure

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

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

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

16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

Effective Date: To be entered upon final issuance

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

C. Emissions Unit Terms and Conditions



1. K001, RTM Lite

Operations, Property and/or Equipment Description:

RTM Lite Gel Coating 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 3745-17-11(C)	See c)(2), c)(3), d)(5) through d)(9) and e)(1)b. below.
b.	OAC rule 3745-21-25	See b)(2)a., d)(2), d)(3) and e)(2) below.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate emissions (PE) shall not exceed 0.34 lb/hr and 0.47 ton/yr. See b)(2)e., c)(1) and d)(1) below.
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)f. below.
e.	OAC rule 3745-31-05(D) [Synthetic minor restriction to avoid the 100 tons per year threshold under OAC rule 3745-21-25] ORC 3704.03(T) [Best Available Technology]	Volatile organic compound (VOC) emissions shall not exceed 37.6 ton/yr, based upon a rolling 12-month summation. See c)(1), d)(1) and e)(1)a. below.
f.	40 CFR Part 63, Subpart WWWW	See b)(2)a. though c.,d)(2), d)(4) and e)(3) below.
g.	40 CFR Part 63, Subpart A	See b)(2)d., c)(4), d)(10) and e)(4) below.

(2) Additional Terms and Conditions

a. The following VOC and organic HAP emissions limitations from Table 2 of OAC rule 3745-21-25 for VOC and Table 3 of 40 CFR Part 63, Subpart WWW for organic HAP shall not be exceeded based on a 12-month rolling average.

Gel Coat Type	VOC/Organic HAP Emissions Limit
Tooling gel coating	440 lb/ton
White/off white pigmented gel coating	267 lb/ton



Effective Date: To be entered upon final issuance

All other pigmented gel coating	377 lb/ton
CR/HS or high performance gel coating	605 lb/ton
Fire retardant gel coating	854 lb/ton
Clear Production gel coating	522 lb/ton

- b. The permittee shall employ only non-HAP-containing cleanup materials in this emissions unit.
- c. The permittee shall keep containers that store HAP-containing coating materials closed or covered, except during the addition or removal of materials.
- d. Table 15 to 40 CFR Part 63, Subpart WWWW – “Applicability of General Provisions (Subpart A) to Subpart WWWW” identifies which parts of the General Provisions in 40 CFR Part 63.1 – 15 apply.
- e. The permittee has satisfied the Best Available Technology (BAT) requirements for particulates pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio’s State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, these emission limitations/control measures no longer apply.
- f. The following paragraph will apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP:
 - i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE for this emissions unit because the potential to emit, taking into consideration the control requirements established under OAC rule 3745-17-11(C), is less than 10 tons per year.

c) Operational Restrictions

- (1) The maximum annual coating usage for this emissions unit shall not exceed 200 tons, based upon a rolling, 12-month summation of the coating usage figures. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage (tons)
1	16.7
1-2	33.3



Effective Date: To be entered upon final issuance

1-3	50.0
1-4	66.7
1-5	83.3
1-6	100.0
1-7	116.7
1-8	133.3
1-9	150.0
1-10	166.7
1-11	183.3
1-12	200.0

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

The maximum annual coating usage for this emissions unit shall not exceed 200tons, based upon a rolling 12-month summation.

- (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.
- (3) 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.
- (4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the coating usage for each month; and
 - b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the coating usage figures.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month.

- (2) The permittee shall utilize one or more compliance options, as specified in OAC rule 3745-21-25(G) for VOC and 40 CFR 63.5810 for organic HAP to demonstrate compliance with the emission standardsspecified in b)(2)a., as described in the following sections:

OAC 3745-21-25(G)(1) 40 CFR 63.5810(a)	individual resin or gel coat compliance demonstration
OAC 3745-21-25(G)(2) 40 CFR 63.5810(b)	average individual VOC/organic HAP emissions limit compliance demonstration for all operations and application methods
OAC 3745-21-25(G)(3) 40 CFR 63.5810(c)	weighted average emission limit compliance demonstration
OAC 3745-21-25(G)(4) 40 CFR 63.5810(d)	organic VOC/HAP emission limit compliance demonstration for one resin type and application method

(3) The permittee shall maintain the records necessary to demonstrate compliance with the applicable emission standards for OAC rule 3745-21-25 in accordance with OAC rule 3745-21-25(P).

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

40 CFR 63.5895(c) - (d)	records of resin and gel coat use, organic HAP content, operation and application method(s)
40 CFR 63.5915(a)	copy of compliance notification(s) and report(s)
40 CFR 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 40 CFR 63.5810
40 CFR 63.5915(d)	certified statement of compliance with work practice requirements
40 CFR 63.5920(a) – (d)	recordkeeping format and retention requirements

(5) 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 Ohio EPA, Central District Office upon request.

(6) 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.

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



- (8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - 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 Ohio EPA, Central District Office upon request.

- (9) 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.
- (10) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the rolling, 12-month limitation on coating usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels; 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 modifications made by the permittee) when the emissions unit was 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.

- (2) The permittee shall submit semi-annual compliance status reports in accordance with OAC rule 3745-21-25(Q).
- (3) The permittee shall comply with the applicable notification and reporting requirements under 40 CFR Part 63, Subpart WWWW, including the following sections:

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



40 CFR 63.5910(c) - (i) and Table 14	content of semi-annual compliance reports
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- (4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
 - (5) 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.
- f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation

Particulate emissions (PE) shall not exceed 0.34 lb/hr and 0.47 ton/yr(as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method

The hourly PE limit was established by the following equation.

$$PE = \text{coating usage} \times \text{solids density} \times (1 - TE) \times (1 - CE), \text{ where:}$$

- Maximum coating usage = 14.00 gal/hr
- Maximum solids density of the coatings = 6.49lb solids/gal coating
- TE = transfer efficiency = 75%
- CE = control efficiency of the particulate filter = 98.5%

The annual PE limit was established by the following equation.

$$PE = \text{coating usage} \times \text{solids density} \times (1 - TE) \times (1 - CE) / 2,000 \text{ lb/ton}, \text{ where:}$$

- Maximum coating usage = 38,910 gal/yr (200 ton/yr x 2,000 lb/ton / 10.28 lb/gal)
- Maximum solids density of the coatings = 6.49 lb solids/gal coating
- TE = transfer efficiency = 75%
- CE = control efficiency of the particulate filter = 98.5%

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

b. Emissions Limitation

Volatile organic compound (VOC) emissions shall not exceed 37.6 ton/yr, based upon a rolling 12-month summation.



Applicable Compliance Method

The VOC limit was established by the following equation.

VOC = coating usage x emissions factor / 2,000 lb/ton, where:

Maximum coating usage = 200 ton/yr

Emission factor = (1.03646 x %HAP – 0.195) x 2,000 = 376.98 lb HAP/ton

Styrene content (%HAP) = 36.943%

This emission factor is specified in Table 1 to 40 CFR Part 63, Subpart WWWW for atomized spray gel coat applications.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A.

c. Emission Limitation

See the VOC/organic HAP emissions limitations specified in b)(2)a.

Applicable Compliance Method

Compliance with the VOC/organic HAP emissions limitations shall be based upon the information collected and recorded in d)(2) and d)(4) of this permit.

g) Miscellaneous Requirements

(1) None.