



Environmental Protection Agency

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

3/6/2012

Certified Mail

JOE PARDY  
SCHMIDT PROGRESSIVE LLC  
360 HARMON AVE  
PO BOX 380  
LEBANON, OH 45036

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 1483060076  
Permit Number: P0108875  
Permit Type: Initial Installation  
County: Warren

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

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](http://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 Southwest Ohio Air Quality Agency. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://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  
SWOAQA; Indiana; Kentucky





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
SCHMIDT PROGRESSIVE LLC**

Facility ID:	1483060076
Permit Number:	P0108875
Permit Type:	Initial Installation
Issued:	3/6/2012
Effective:	3/6/2012





Division of Air Pollution Control
Permit-to-Install
for
SCHMIDT PROGRESSIVE LLC

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## Authorization

Facility ID: 1483060076

Facility Description:

Application Number(s): A0042730

Permit Number: P0108875

Permit Description: Initial PTI for five (5) emissions units that were formerly on registration status at an existing reinforced plastic composites production facility and initial Installation for two (2) new emission units; with this permit the facility will be considered a major stationary source of HAP emissions subject to MACT rule - 40 CFR Part 63, Subpart WWWW and Title V operating permitting.

Permit Type: Initial Installation

Permit Fee: \$1,600.00

Issue Date: 3/6/2012

Effective Date: 3/6/2012

This document constitutes issuance to:

SCHMIDT PROGRESSIVE LLC  
360 HARMON AVENUE  
Lebanon, OH 45036

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

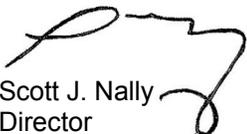
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency  
250 William Howard Taft Rd.  
Cincinnati, OH 45219  
(513)946-7777

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: P0108875

Permit Description: Initial PTI for five (5) emissions units that were formerly on registration status at an existing reinforced plastic composites production facility and initial Installation for two (2) new emission units; with this permit the facility will be considered a major stationary source of HAP emissions subject to MACT rule - 40 CFR Part 63, Subpart WWWW and Title V operating permitting.

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

Emissions Unit ID: P010
Company Equipment ID: Resin Transfer Molding
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: P011
Company Equipment ID: Cleanup, Facility-Wide
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Group Name: Open Molding

Table with 2 columns: Emissions Unit ID and details. Rows include P001 (Booth No. 1 - Main Front), P003 (Booth No. 3 - Main Back), P004 (Booth No. 4 - Tooling), P005 (Booth No. 5 - Gel Coat Main Front), and P006 (Booth No. 6 - Gel Coat Mezzanine).

## **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 Southwest Ohio Air Quality Agency.

- (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 Southwest Ohio Air Quality Agency. 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 Southwest Ohio Air Quality Agency 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 Southwest Ohio Air Quality Agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

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

## 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 Southwest Ohio Air Quality 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.

**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 Southwest Ohio Air Quality Agency.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have

been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Southwest Ohio Air Quality Agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (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. P010, Resin Transfer Molding**

**Operations, Property and/or Equipment Description:**

2000 pounds per day RTM (resin transfer molding) injecting catalyzed resins into a closed mold.

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(A)(3), as effective 11/30/01	Emissions of volatile organic compounds (VOC) shall not exceed 30.16 pounds per day and 5.50 tons per year (TPY).  See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	OAC rules 3745-21-25(A) through (S)	The affected operations are mixing, and VOC-containing materials storage associated with a closed molding, resin transfer molding, operation.  See b)(2)c. and b)(2)d.
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 5935) [In accordance with 40 CFR 63.5790, 40 CFR 63.5795 and Table 4, this emissions unit includes mixing, and a HAP-containing materials storage operation associated with a closed molding, resin transfer molding, operation at an existing reinforced plastic composites production facility because this emissions unit was installed on 6/3/2002 (new is installed after 8/2/2011) subject to the emission limits and work practice standards specified in this section.]	See b)(2)e. and b)(2)f.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR Part 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to 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, then these emission limitations/control measures no longer apply.

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled Potential to Emit (PTE) for VOC is less than 10 TPY.

- c. The following requirements apply to the affected operations in this emissions unit pursuant to Table 1:

- i. Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1.0 inch are permissible around mixer shafts and any required instrumentation;
- ii. Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety;
- iii. Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels;
- iv. Containers of five gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin);

v. Keep containers that store VOC-containing materials closed or covered except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety.

d. In accordance with paragraph (A)(1) of OAC rule 3745-21-25, this facility is subject to the 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 within 12 months from the rule's effective date of December 14, 2009.

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.

e. The following requirements apply to the affected operations in this emissions unit pursuant to Table 4:

63.5805(b) mixer covers, mixer vents, closed covers [requirements are equivalent to Table 1, Work Practice Standards, in OAC rules 3745-21-25 (A) through (S); see b)(2)c.i. – iv. above].

63.5805(b) HAP-containing materials storage [requirements for HAP-containing materials storage are equivalent to Table 1, Work Practice Standards, in OAC rules 3745-21-25 (A) through (S) for VOC-containing materials storage; see b)(2)c.v. above].

f. This emissions unit is subject to 40 CFR Part 63, Subpart WWWW. The complete MACT, including 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.

g. The VOC emission limits were established based on the emission unit's Potential to Emit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with these emission limits beyond those listed in d) and e).

h. Since the facility-wide PTE VOC/HAP does not exceed 100 TPY, the facility will not be subject to the emission reduction control requirements in OAC rule 3745-21-25(D)(3) and 40 CFR 63.5805.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The owner or operator shall maintain the following records pursuant to OAC rule 3745-21-25(P):

- a. A copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status; and
  - b. A certified statement that operations are in compliance with the work practice standards specified in Table 1 of OAC rule 3745-21-25, as applicable.
- (2) The permittee shall comply with the applicable recordkeeping requirements required under 40 CFR Part 63, Subpart WWWW as described in the following sections, and which are equivalent to the requirements listed in d)(1) above:
- 63.5915(a)(1) & (a)(2) Retain copies of Notifications & records of Startups, Shutdowns, & Malfunctions (SSM)
- 63.5915(d) Work practice standards compliance certification
- 63.5920(a) – (d) Recordkeeping format and retention requirements
- e) Reporting Requirements
- (1) The owner or operator of a facility that has reinforced plastic composites production operations subject to OAC rule 3745-21-25 shall submit semiannual compliance status reports containing the applicable information specified in paragraph (Q)(3) of the rule. The semiannual compliance status reports shall be submitted no later than thirty calendar days after the end of each six-month period to the Hamilton County Department of Environmental Services. The first compliance report shall cover the period beginning on the compliance date that is specified in paragraph (R) of the rule and ending on June thirtieth or December thirty-first, whichever date is the first date following the end of the first calendar half after the compliance date that is specified in paragraph (R) of the rule. Each subsequent compliance report shall cover the semiannual reporting period from January first through June thirtieth or the semiannual reporting period from July first through December thirty-first.
- For each facility that is subject to permitting requirements pursuant to Chapter 3745-77 of the Administrative Code (pertaining to Title V permits), the owner or operator may submit the first and subsequent semiannual compliance reports according to the dates established within the facility's Title V permit, instead of according to the dates specified in paragraph (Q)(1) of OAC rule 3745-21-25.
- The compliance report shall contain the information specified in paragraphs (Q)(3) of the rule.
- a. Company name and address;
  - b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
  - c. Date of the report and beginning and ending dates of the reporting period;

- d. If there are no deviations from the work practice standards in table 1 of this rule, a statement that there were no deviations from work practice standards during the reporting period;
  - e. For each deviation of a work practice standard that occurs at an affected operation where a (continuous monitoring system) CMS is not used to comply with the work practice standard in the rule, the compliance report shall contain the information in paragraphs (Q)(3)(f)(i) and (Q)(3)(f)(ii) of the rule; and
    - i. The total operating time of each affected operation during the reporting period; and
    - ii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
  - f. Where multiple compliance options are available, the owner or operator shall state in this compliance report if the owner or operator has changed compliance options since the last compliance report.
- (2) The permittee shall submit semiannual reports and other such notifications and reports to the Hamilton County Department of Environmental Services as are required pursuant to 40 CFR Part 63, Subpart WWWW, per the following sections which are equivalent to the requirements in OAC rule 3745-21-25 (except SSM notification):
- 63.5905(a) Initial Notification per requirement in 63.9(b)(2)
  - 63.5910(b) Semi-annual compliance report & SSM events.
- 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. Emission Limitations:  
  
Emissions of volatile organic compounds (VOC) shall not exceed 30.16 pounds per day and 5.50 tons per year (TPY).  
  
Applicable Compliance Method:  
  
If required, compliance with the allowable VOC emission limitations shall be demonstrated by multiplying the actual resin usage, in tons per day and/or tons per year, by the applicable VOC EFs as calculated for the specific process streams in f)(1)a., in pounds of VOC per ton, yielding emissions in pounds of VOC per day and/or pounds VOC per year. Pounds of VOC per year shall be converted to TPY by dividing by 2000.

The applicable emission limitations were established based on information provided by the permittee in application A0042730 for PTI P0108875 and the emission factor in Table 4.4-2 of AP-42, Fifth Ed., 02/07, for SCC ID 30800742:

$2000 \text{ pounds resin/day} \times 0.50 \text{ pound of VOC/pound resin} \times 0.03 \text{ pound of VOC lost/pound VOC} = 30 \text{ pounds of VOC (organic HAP)/day};$

$2000(0.02) \text{ pounds of catalyst/day} \times 0.004 \text{ pound of VOC/pound catalyst} = 0.16 \text{ pound of VOC/day};$  and,

$30.16 \text{ pounds of VOC (organic HAP)/day} \times 365 \text{ days/year} \times 1 \text{ ton/2000 pounds} = 5.50 \text{ TPY of VOC (organic HAP)}.$

g) Miscellaneous Requirements

(1) None.

**2. P011, Cleanup, Facility-Wide**

**Operations, Property and/or Equipment Description:**

Facility-wide VOC/HAP-containing cleanup material usage (to remove cured resin from tools & molds) and acetone cleanup w/on-site acetone distillation & recovery

- 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(A)(3), as effective 11/30/01	Emissions of volatile organic compounds (VOC) in this emission unit shall not exceed 11.01 pounds per day and 2.01 tons per year (TPY) from the use of VOC/HAP-containing cleaners to clean cured resin from application equipment that directly contacts resin.  See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	ORC 3704.03(T)	Emissions of organic compounds (OC) in this emission unit shall not exceed 39.66 tons per year (TPY), based on a rolling, 12-month summation, from the use of non-VOC/HAP-containing cleaners in facility-wide cleanup.
d.	OAC rules 3745-21-25(A) through (S)	The affected operations are cleanup using organic VOC-containing cleaners to clean cured resin from application equipment that directly contacts resin and VOC-containing materials storage.  See b)(2)c. and b)(2)d.
e.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 5935) [In accordance with 40 CFR 63.5790, 40 CFR 63.5795 and Table	See b)(2)e. and b)(2)f.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	4, this emissions unit includes cleanup using organic HAP-containing cleaners to clean cured resin from application equipment that directly contacts resin and a HAP-containing materials storage operation at an existing reinforced plastic composites production facility because this emissions unit was installed on 6/1/1972 (new is installed after 8/2/2011) subject to the emission limits and work practice standards specified in this section.]	
f.	40 CFR Part 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to 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, then these emission limitations/control measures no longer apply.
  
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.  
  
 The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled Potential to Emit (PTE) for VOC is less than 10 TPY.
  
- c. The following requirements apply to the affected operations in this emissions unit pursuant to Table 1:

- i. Do not use cleaning solvents (cleaners) that have a VOC content greater than 0.42 pound VOC per gallon, except cleaners used in closed systems and used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin; and
- ii. Keep containers that store VOC-containing materials closed or covered except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety.

- d. In accordance with paragraph (A)(1) of OAC rule 3745-21-25, this facility is subject to the 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 within 12 months from the rule's effective date of December 14, 2009.

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.

- e. The following requirements apply to the affected operations in this emissions unit pursuant to Table 4:

63.5805(a)organic HAP containing cleaners for cleaning cured resin

63.5805(a)HAP-containing materials storage [requirements for HAP-containing materials storage are equivalent to Table 1, Work Practice Standards, in OAC rules 3745-21-25 (A) through (S) for VOC-containing materials storage; see b)(2)c.ii. above].

- f. This emissions unit is subject to 40 CFR Part 63, Subpart WWWW. The complete MACT, including 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.
- g. The VOC and OC emission limits were established based on the emission unit's Potential to Emit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with these emission limits beyond those listed in d) and e).
- h. Since the facility-wide PTE VOC/HAP does not exceed 100 TPY, the facility will not be subject to the emission reduction control requirements in OAC rule 3745-21-25(D)(3) and 40 CFR 63.5805.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emission unit:
  - a. The company identification of each cleanup material employed;
  - b. The number of gallons of each cleanup material employed, for each non-VOC/HAP cleanup material and for each VOC/HAP cleanup material;
  - c. The OC content of each cleanup material employed, in pounds OC per gallon of cleanup material, for each non-VOC/HAP cleanup material; and
  - d. The total VOC/HAP content of each cleanup material employed, in pounds VOC per gallon of cleanup material, for each VOC/HAP cleanup material;
  - e. The total OC emissions from all the non-VOC/HAP cleanup materials employed, in pounds\* [i.e., the summation of the products of d)(1)b. multiplied by d)(1)c. for each non-VOC/HAP cleanup material employed];
  - f. The total VOC/HAP emissions from all the VOC/HAP cleanup materials employed, in pounds\* [i.e., the summation of the products of d)(1)b. multiplied by d)(1)d. for each VOC/HAP cleanup material employed]; and
  - g. The updated rolling, 12-month emissions of OC, in tons per year, from the use of non-VOC/HAP cleanup materials (the summation of the monthly OC emissions as calculated in d)(2)e. for the current month plus the previous eleven months).

\*In the calculations in e. and f., the permittee may take credit for any non-VOC/HAP and/or VOC/HAP cleanup materials recovered.
- (2) The owner or operator shall maintain the following records pursuant to OAC rule 3745-21-25(P):
  - a. A copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status; and
  - b. A certified statement that operations are in compliance with the work practice standards specified in Table 1 of OAC rule 3745-21-25, as applicable.
- (3) The permittee shall comply with the applicable recordkeeping requirements required under 40 CFR Part 63, Subpart WWWW as described in the following sections, and which are equivalent to the requirements listed in d)(1) above:
  - 63.5915(a)(1) & (a)(2) Retain copies of Notifications & records of Startups, Shutdowns, & Malfunctions (SSM);
  - 63.5915(d) Work practice standards compliance certification; and
  - 63.5920(a) – (d) Recordkeeping format and retention requirements.

e) Reporting Requirements

- (1) The owner or operator of a facility that has reinforced plastic composites production operations subject to OAC rule 3745-21-25 shall submit semiannual compliance status reports containing the applicable information specified in paragraph (Q)(3) of the rule. The semiannual compliance status reports shall be submitted no later than thirty calendar days after the end of each six-month period to the Hamilton County Department of Environmental Services. The first compliance report shall cover the period beginning on the compliance date that is specified in paragraph (R) of the rule and ending on June thirtieth or December thirty-first, whichever date is the first date following the end of the first calendar half after the compliance date that is specified in paragraph (R) of the rule. Each subsequent compliance report shall cover the semiannual reporting period from January first through June thirtieth or the semiannual reporting period from July first through December thirty-first.

For each facility that is subject to permitting requirements pursuant to Chapter 3745-77 of the Administrative Code (pertaining to Title V permits), the owner or operator may submit the first and subsequent semiannual compliance reports according to the dates established within the facility's Title V permit, instead of according to the dates specified in paragraph (Q)(1) of OAC rule 3745-21-25.

The compliance report shall contain the information specified in paragraphs (Q)(3) of the rule.

- a. Company name and address;
- b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
- c. Date of the report and beginning and ending dates of the reporting period;
- d. If there are no deviations from the work practice standards in table 1 of this rule, a statement that there were no deviations from work practice standards during the reporting period;
- e. For each deviation of a work practice standard that occurs at an affected operation where a (continuous monitoring system) CMS is not used to comply with the work practice standard in the rule, the compliance report shall contain the information in paragraphs (Q)(3)(f)(i) and (Q)(3)(f)(ii) of the rule; and
  - i. The total operating time of each affected operation during the reporting period; and
  - ii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
- f. Where multiple compliance options are available, the owner or operator shall state in this compliance report if the owner or operator has changed compliance options since the last compliance report.

- (2) The permittee shall submit semiannual reports and other such notifications and reports to the Hamilton County Department of Environmental Services as are required pursuant to 40 CFR Part 63, Subpart WWWW, per the following sections which are equivalent to the requirements in OAC rule 3745-21-25 (except SSM notification):

63.5905(a) Initial Notification per requirement in 63.9(b)(2); and

63.5910(b) Semi-annual compliance report & SSM events.

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. Emission Limitations:

Emissions of volatile organic compounds (VOC) in this emission unit shall not exceed 11.01 pounds per day and 2.01 tons per year (TPY) from the use of VOC/HAP-containing cleaners to clean cured resin from application equipment that directly contacts resin.

Applicable Compliance Methods:

Compliance with the daily VOC emission limitation shall be demonstrated by the recordkeeping requirement in d)(1)f. Compliance with the annual VOC emission limitation shall be demonstrated by a summation of the daily VOC emissions, as calculated in d)(1)f., for each day in the calendar year, converted to TPY by dividing by 2000.

b. Emissions Limitation:

Emissions of organic compounds (OC) in this emission unit shall not exceed 39.66 tons per year (TPY), based on a rolling, 12-month summation, from the use of non-VOC/HAP-containing cleaners in facility-wide cleanup.

Applicable Compliance Method:

Compliance with the rolling, 12-month emission limitation shall be demonstrated by the recordkeeping requirement in d)(1)g.

g) Miscellaneous Requirements

- (1) None.

**3. Emissions Unit Group -Open Molding: P001,P003,P004,P005,P006,**

EU ID	Operations, Property and/or Equipment Description
P001	750 pounds per day Open Molding, non CR/HS, Mechanical Application, Booth No. 1
P003	700 pounds per day Open Molding, non CR/HS, Mechanical Application or Gel Spray nonatomized, Booth No. 3
P004	300 pounds per day Tooling Open Molding, non CR/HS, Mechanical or Gel Spray nonatomized, Booth No. 4
P005	300 pounds per day Gel Coat Application, nonatomized, Booth No. 5
P006	100 pounds per day Gel Coat application, nonatomized, Booth No. 6

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.	ORC 3704.03(T)	The requirements of this rule are equivalent to the requirements established in 40 CFR Part 63, Subpart WWWW.
b.	OAC rule 3745-17-11(C)	See c)(1) and c)(2).
c.	OAC rules 3745-21-25(A) through (S)	<p>The requirements of this rule are equivalent to the requirements established in 40 CFR Part 63, Subpart WWWW.</p> <p>The affected operations are open molding operations: resin application, filament application, atomized and non-atomized gel coat application; and the mixing, and volatile organic compound (VOC) - containing materials storage associated with open molding.</p> <p>See b)(2)c. and b)(2)d.</p>
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 5935) [In accordance with 40 CFR	See b)(2)a., b)(2)b., and b)(2)e.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	63.5790, 40 CFR 63.5795 and Table 4, this emissions unit may include the following open molding operations: resin application, filament application, atomized and non-atomized gel coat application; and the mixing, and hazard air pollutant (HAP) - containing materials storage associated with open molding at an existing reinforced plastic composites production facility because this emissions unit was installed on 6/1/1972 (new is installed after 8/2/2011) subject to the emission limits and work practice standards specified in this section.]	
e.	40 CFR Part 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

- a. The following requirements are potentially applicable to the affected operations in these emission units as specified in Table 4 of 40 CFR Part 63, Subpart WWWW:
  - i. Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1.0 inch are permissible around mixer shafts and any required instrumentation;
  - ii. Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety;
  - iii. Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels;
  - iv. Containers of five gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin); and

- v. Keep containers that store HAP-containing 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.
  
- b. The following organic HAP emission limitations are potentially applicable to these emission units, based on application technique and material properties, as specified in Table 3 of 40 CFR Part 63, Subpart WWWW, and shall not be exceeded based on compliance option selected in d)(2):
  - i. Emissions of HAP shall not exceed 113 pounds per ton of resin for an open molding, corrosion-resistant and/or high strength (CR/HS), mechanical resin application operation;
  - ii. Emissions of HAP shall not exceed 171 pounds per ton of resin for an open molding, corrosion-resistant and/or high strength (CR/HS), filament application operation;
  - iii. Emissions of HAP shall not exceed 123 pounds per ton of resin for an open molding, corrosion-resistant and/or high strength (CR/HS), manual resin application operation;
  - iv. Emissions of HAP shall not exceed 88 pounds per ton of resin for an open molding, non-CR/HS, mechanical resin application operation;
  - v. Emissions of HAP shall not exceed 188 pounds per ton of resin for an open molding, non-CR/HS, filament application operation;
  - vi. Emissions of HAP shall not exceed 87 pounds per ton of resin for an open molding, non-CR/HS, manual resin application operation;
  - vii. Emissions of HAP shall not exceed 254 pounds per ton of resin for an open molding, tooling, mechanical resin application operation;
  - viii. Emissions of HAP shall not exceed 157 pounds per ton of resin for an open molding, tooling, manual resin application operation;
  - ix. Emissions of HAP shall not exceed 497 pounds per ton of resin for an open molding, low-flame spread/low-smoke products, mechanical resin application operation;
  - x. Emissions of HAP shall not exceed 270 pounds per ton of resin for an open molding, low-flame spread/low-smoke products, filament application operation;
  - xi. Emissions of HAP shall not exceed 238 pounds per ton of resin for an open molding, low-flame spread/low-smoke products, manual resin application operation;
  - xii. Emissions of HAP shall not exceed 354 pounds per ton of resin for an open molding, shrinkage controlled resins, mechanical resin application operation;

- xiii. Emissions of HAP shall not exceed 215 pounds per ton of resin for an open molding, shrinkage controlled resins, filament application operation;
- xiv. Emissions of HAP shall not exceed 180 pounds per ton of resin for an open molding, shrinkage controlled resins, manual resin application operation;
- xv. Emissions of HAP shall not exceed 440 pounds per ton of gel coat for an open molding, tooling gel coat, application operation;
- xvi. Emissions of HAP shall not exceed 267 pounds per ton of gel coat for an open molding, white/off white pigmented gel coat, application operation;
- xvii. Emissions of HAP shall not exceed 377 pounds per ton of gel coat for an open molding, all other pigmented gel coat, application operation;
- xviii. Emissions of HAP shall not exceed 605 pounds per ton of gel coat for an open molding, CR/HS or high performance gel coat, application operation;
- xix. Emissions of HAP shall not exceed 854 pounds per ton of gel coat for an open molding, fire retardant gel coat, application operation; and
- xx. Emissions of HAP shall not exceed 522 pounds per ton of gel coat for an open molding, clear production gel coat, application operation.

c. In accordance with paragraph (A)(1) of OAC rule 3745-21-25, this facility is subject to the 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 within 12 months from the rule's effective date of December 14, 2009.

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 requirements are potentially applicable to the affected operations in these emission units as specified in Tables 1 and 2 of OAC rule 3745-21-25:

Table 1 mixer covers, mixer vents, closed covers [requirements are equivalent to Table 4, Work Practice Standards, in 40 CFR 63.5805(b); see b)(2)a.i. – iv. above].

Table 1 VOC-containing materials storage [requirements for VOC-containing materials storage are equivalent to Table 4, Work Practice Standards, in 40 CFR 63.5805(b); see b)(2)a.v. above].

Table 2 VOC emission limitations for specific open molding operations [requirements are equivalent to Table 3, organic HAP

Emission Limits for specific open molding operations, in 40 CFR 63.5805(b); see b)(2)d.i. through b)(2)d.xx.

- e. This emissions unit is subject to 40 CFR Part 63, Subpart WWWW. The complete MACT, including 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.
- f. The VOC emission limits were established based on the emission unit's Potential to Emit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with these emission limits beyond those listed in d) and e).
- g. Since the facility-wide PTE VOC/HAP does not exceed 100 TPY, the facility will not be subject to the emission reduction control requirements in OAC rule 3745-21-25(D)(3) and 40 CFR 63.5805.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system(s) for the control of particulate emissions whenever these emission units are in operation while atomizing gel coat and shall maintain the dry particulate filter(s) in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the particulate filter system(s) are not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, while atomizing gel coat, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The owner or operator shall use of the following methods, also as outlined in paragraphs (G)(1) to (G)(4) of OAC rule 3745-21-25, to meet the VOC emission limits for open molding operations specified in Table 2 of the rule. The owner or operator may use any control method that reduces VOC emissions, including reducing resin and gel coat monomer content, changing to non-atomized mechanical application, using covered curing techniques, and routing part or all of the VOC emissions to add-on control. The owner or operator may use different compliance options for the different operations listed in Table 2 of this rule. The necessary calculations shall be completed within thirty days after the end of each month.

The owner or operator may switch between the compliance options in paragraphs (G)(1) to (G)(4) of OAC rule 3745-21-25. When the owner or operator changes to an option based on a 12-month rolling average, the owner or operator shall base the average on the previous 12 months of data calculated using the compliance option the owner or operator is changing to, unless the owner or operator was previously using an option that did not require the owner or operator to maintain records of resin and gel coat use.

In this case, the owner or operator shall immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

- a. Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in b)(2)b., and also as outlined in Table 2 of OAC rule 3745-21-25;
  - b. Demonstrate that, on average, the individual VOC emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 2 of OAC rule 3745-21-25 that applies to the facility are met;
  - c. Demonstrate each month that each weighted average of the VOC emissions limits in Table 2 of OAC rule 3745-21-25 that apply are being met; or
  - d. Meet the VOC emission limit for one application method and use the same resins for all application methods of that resin type. This option is limited to resins of the same type.
- (2) 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 Subpart WWWW, as described in the following sections, and which are equivalent to the requirements listed in d)(1) above:
- a. 63.5810(a) Individual resin or gel coat compliance demonstration;
  - b. 63.5810(b) Average individual limit compliance demonstration for all organic HAP emissions operations and application methods;
  - c. 63.5810(c) Weighted average emission limit compliance demonstration; and
  - 63.5810(d) Organic HAP emission limitation compliance demonstration for one resin type and application method.
- (3) For meeting any VOC emission limits based on a VOC emissions limit specified in Table 2 of OAC rule 3745-21-25, the owner or operator shall collect and keep records of resin and gel coat use, monomer content, and operation where the resin is used. Resin use records may be based on purchase records if the owner or operator can reasonably estimate how the resin is applied.

Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission limit as defined in paragraph (G)(1) of OAC rule 3745-21-25. However, the owner or operator shall retain the records of resin and gel coat monomer content, and the owner or operator shall include the list of these resins and gel coats and identify their application methods in the semiannual compliance reports. If after the owner or operator has initially demonstrated that a specific combination of an individual resin or gel coat, application method, and controls meets an applicable emission limit, and the resin or gel coat changes or the monomer content increases, or the owner or operator changes the application method or controls, then the owner or operator again shall demonstrate that the individual resin or gel coat meets its emission limit as specified in paragraph (G)(1) of OAC rule 3745-21-25.

If any of the previously mentioned changes results in a situation where an individual resin or gel coat exceeds its applicable emission limit in table 2 of OAC rule 3745-21-25, the owner or operator shall begin collecting resin and gel coat use records and calculate compliance using one of the averaging options on a twelve-month rolling average.

- (4) The owner or operator shall maintain the following records pursuant to OAC rule 3745-21-25(P):
  - a. A copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status;
  - b. For operations listed in Tables 2, 3, and 4 of OAC rule 3745-21-25, all data, assumptions, and calculations used to determine VOC emission factors; and
  - c. A certified statement that operations are in compliance with the work practice standards specified in Table 1 of OAC rule 3745-21-25, as applicable.
  
- (5) The permittee shall comply with the applicable recordkeeping requirements required under 40 CFR Part 63, Subpart WWWW as described in the following sections, and which are equivalent to the requirements listed in d)(3) and d)(4) above:
  - 63.5895(c) – (d) Records of resin and gel coat use, organic HAP content, operation and application methods;
  - 63.5915(a)(1) & (a)(2) Retain copies of Notifications & records of Startups, Shutdowns, & Malfunctions (SSM);
  - 63.6915(c) Organic HAP emissions data;
  - 63.5915(d) Work practice standards compliance certification; and
  - 63.5920(a) – (d) Recordkeeping format and retention requirements.
  
- (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.
  
- (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.
  
- (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.

- (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 the appropriate Ohio EPA District Office or local air agency upon request.

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

e) Reporting Requirements

- (1) The owner or operator of a facility that has reinforced plastic composites production operations subject to OAC rule 3745-21-25 shall submit semiannual compliance status reports containing the applicable information specified in paragraph (Q)(3) of the rule. The semiannual compliance status reports shall be submitted no later than thirty calendar days after the end of each six-month period to the Hamilton County Department of Environmental Services. The first compliance report shall cover the period beginning on the compliance date that is specified in paragraph (R) of the rule and ending on June thirtieth or December thirty-first, whichever date is the first date following the end of the first calendar half after the compliance date that is specified in paragraph (R) of the rule. Each subsequent compliance report shall cover the semiannual reporting period from January first through June thirtieth or the semiannual reporting period from July first through December thirty-first.

For each facility that is subject to permitting requirements pursuant to Chapter 3745-77 of the Administrative Code (pertaining to Title V permits), the owner or operator may submit the first and subsequent semiannual compliance reports according to the dates established within the facility's Title V permit, instead of according to the dates specified in paragraph (Q)(1) of OAC rule 3745-21-25.

The compliance report shall contain the information specified in paragraphs (Q)(3) of the rule.

- a. Company name and address;
  - b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
  - c. Date of the report and beginning and ending dates of the reporting period;
  - d. If there are no deviations from any VOC emissions limitations and operating limits that apply and there are no deviations from the work practice standards in table 1 of this rule, a statement that there were no deviations from VOC emissions limitations, operating limits, or work practice standards during the reporting period;
  - e. For each deviation from a VOC emissions limitation or operating limit and for each deviation of a work practice standard that occurs at an affected operation where a (continuous monitoring system) CMS is not used to comply with the work practice standard in the rule, the compliance report shall contain the information in paragraphs (Q)(3)(f)(i) and (Q)(3)(f)(ii) of the rule; and
    - i. The total operating time of each affected operation during the reporting period; and
    - ii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
  - f. Where multiple compliance options are available, the owner or operator shall state in this compliance report if the owner or operator has changed compliance options since the last compliance report.
- (2) The owner or operator shall report to the Hamilton County Department of Environmental Services if the facility exceeded the one hundred tons of VOC per year emissions threshold if that exceedance would make the facility subject to paragraph (D)(3) of OAC rule 3745-21-25.
- (3) Each facility that has obtained a Title V permit pursuant to Chapter 3745-77 of the Administrative Code shall report all deviations, as described in OAC rule 3745-21-25, in the semiannual monitoring report required by the Title V permit. If the facility submits a semiannual compliance report pursuant to this rule along with, or as part of, the semiannual monitoring report required by the facility's Title V permit, and the semiannual compliance report includes all required information concerning deviations from any VOC emissions limitation, operating limit, or work practice standard in this rule, submission of the semiannual compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the Hamilton County Department of Environmental Services.

- (4) The permittee shall submit semiannual reports and other such notifications and reports to the Hamilton County Department of Environmental Services as are required pursuant to 40 CFR Part 63, Subpart WWWW, per the following sections which are equivalent to the requirements in OAC rule 3745-21-25 (except SSM notification):

63.5905(a) Initial Notification per requirement in 63.9(b)(2); and

63.5910(b) Semi-annual compliance report & SSM events.

- (5) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

- a. any daily record showing that the dry particulate filter system(s) were 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 in atomized spray gel coat application.

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Hamilton County Department of Environmental Services).

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. Emission Limitations:

Emissions of HAP shall not exceed 113 pounds per ton of resin for an open molding, corrosion-resistant and/or high strength (CR/HS), mechanical resin application operation

Emissions of HAP shall not exceed 171 pounds per ton of resin for an open molding, corrosion-resistant and/or high strength (CR/HS), filament application operation

Emissions of HAP shall not exceed 123 pounds per ton of resin for an open molding, corrosion-resistant and/or high strength (CR/HS), manual resin application operation

Emissions of HAP shall not exceed 88 pounds per ton of resin for an open molding, non-CR/HS, mechanical resin application operation

Emissions of HAP shall not exceed 188 pounds per ton of resin for an open molding, non-CR/HS, filament application operation

Emissions of HAP shall not exceed 87 pounds per ton of resin for an open molding, non-CR/HS, manual resin application operation

Emissions of HAP shall not exceed 254 pounds per ton of resin for an open molding, tooling, mechanical resin application operation

Emissions of HAP shall not exceed 157 pounds per ton of resin for an open molding, tooling, manual resin application operation

Emissions of HAP shall not exceed 497 pounds per ton of resin for an open molding, low-flame spread/low-smoke products, mechanical resin application operation

Emissions of HAP shall not exceed 270 pounds per ton of resin for an open molding, low-flame spread/low-smoke products, filament application operation

Emissions of HAP shall not exceed 238 pounds per ton of resin for an open molding, low-flame spread/low-smoke products, manual resin application operation

Emissions of HAP shall not exceed 354 pounds per ton of resin for an open molding, shrinkage controlled resins, mechanical resin application operation

Emissions of HAP shall not exceed 215 pounds per ton of resin for an open molding, shrinkage controlled resins, filament application operation

Emissions of HAP shall not exceed 180 pounds per ton of resin for an open molding, shrinkage controlled resins, manual resin application operation

Emissions of HAP shall not exceed 440 pounds per ton of gel coat for an open molding, tooling gel coat, application operation

Emissions of HAP shall not exceed 267 pounds per ton of gel coat for an open molding, white/off white pigmented gel coat, application operation

Emissions of HAP shall not exceed 377 pounds per ton of gel coat for an open molding, all other pigmented gel coat, application operation

Emissions of HAP shall not exceed 605 pounds per ton of gel coat for an open molding, CR/HS or high performance gel coat, application operation

Emissions of HAP shall not exceed 854 pounds per ton of gel coat for an open molding, fire retardant gel coat, application operation

Emissions of HAP shall not exceed 522 pounds per ton of gel coat for an open molding, clear production gel coat, application operation

Emissions of VOC which are equivalent to organic HAPs as stated in b)(2)e.

Applicable Compliance Method:

Compliance with the emission limitations shall be based upon the information collected and recorded in d)(1) through d)(3) and as specified below:

Compliance with the applicable emission limitations shall be demonstrated by maintaining a VOC emissions factor value less than or equal to the appropriate VOC emissions limit(s) listed in Table 2 of OAC rule 3745-21-25, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate VOC emissions limits, as discussed in paragraph (O)(2)(c) of OAC rule 3745-21-25.

The permittee may use the equations in table 1 to Subpart WWWW of 40 CFR 63 to calculate such emissions factors or may use any VOC emission factor approved by USEPA, such as emission factors or emission factor equations from AP-42. These equations and emission factors are intended to provide a method for one to demonstrate compliance without the need to conduct a VOC emissions test.

In lieu of the equations and emission factors, the owner or operator can elect to use site-specific VOC emission factors to demonstrate compliance and to calculate VOC emissions provided the site specific VOC emission factors are incorporated in the facility's air emissions permit and are based on actual facility VOC emissions test data using the test procedures in 40 CFR 63.5850 or paragraph (C) of rule 3745-21-10 of the Administrative Code. Stack test data for the facility shall supersede emission factors and other emission estimating techniques.

The annual organic VOC emissions from these emission units, combined, were determined to be > 10 TPY making this emission unit subject to ORC 3704.03(T). The emissions were derived from the following calculations:

From P001:

$750 \text{ pounds of resin/day} \times 1 \text{ Ton}/2000 \text{ pounds} \times 88 \text{ pounds of VOC (organic HAP)}/\text{ton resin} = 33 \text{ pounds of VOC (organic HAP)}/\text{day}; \text{ and}$

$750(0.02) \text{ pounds of catalyst}/\text{day} \times 0.004 \text{ pound of VOC}/\text{pound catalyst} = 0.06 \text{ pound of VOC}/\text{day}.$

$33 \text{ pounds of VOC}/\text{day} + 0.06 \text{ pound of VOC}/\text{day} = 33.06 \text{ pounds of VOC}/\text{day}.$

$33 \text{ pounds of VOC (organic HAP)}/\text{day} \times 365 \text{ days}/\text{year} \times 1 \text{ Ton}/2000 \text{ pounds} = 6.02 \text{ TPY of VOC (organic HAP)}.$

$0.06 \text{ pound of VOC}/\text{day} \times 365 \text{ days}/\text{year} \times 1 \text{ Ton}/2000 \text{ pounds} = 0.01 \text{ TPY of VOC}.$

$6.02 \text{ TPY of VOC} + 0.01 \text{ TPY of VOC} = 6.03 \text{ TPY of VOC}.$

From P003:

22.04 pounds of VOC (organic HAP)/day x 365 days/year x 1 Ton/2000 pounds = 4.02 TPY of VOC (organic HAP).

44.02 pounds of VOC (organic HAP)/day x 365 days/year x 1 Ton/2000 pounds = 8.03 TPY of VOC (organic HAP).

0.06 pound of VOC (organic HAP)/day x 365 days/year x 1 Ton/2000 pounds = 0.01 TPY of VOC (organic HAP).

4.02 TPY VOC + 8.03 TPY VOC + 0.01 TPY VOC = 12.06 TPY of VOC.

From P004:

250 pounds of resin/day x 1Ton/2000 pounds x 254 pounds of VOC (organic HAP)/ton of resin = 31.75 pounds of VOC (organic HAP)/day.

50 pounds of gel coat/day x 1Ton/2000 pounds x 440 pounds of VOC (organic HAP)/ton gel coat = 11 pounds of VOC (organic HAP)/day.

300(0.02) pounds of catalyst/day x 0.004 pound of VOC/pound catalyst = 0.024 pound of VOC/day.

31.75 pounds of VOC/day + 11 pounds of VOC/day + 0.024 pound of VOC/day = 42.77 pounds of VOC/day.

31.75 pounds of VOC (organic HAP)/day x 365 days/year x 1 Ton/2000 pounds = 5.79 TPY of VOC (organic HAP).

11 pounds of VOC (organic HAP)/day x 365 days/year x 1 Ton/2000 pounds = 2.01 TPY of VOC (organic HAP).

0.024 pound of VOC/day x 365 days/year x 1 Ton/2000 pounds = 0.004 TPY of VOC (organic HAP).

5.79 TPY of VOC + 2.01 TPY of VOC + 0.004 TPY of VOC = 7.80 TPY of VOC.

From P005:

90.77 pounds of VOC (organic HAP)/day x 365 days/year x 1 Ton/2000 pounds = 16.57 TPY of VOC (organic HAP).

From P006:

100 pounds of gel coat/day x 1Ton/2000 pounds x 605 pounds of VOC (organic HAP)/ton gel coat = 30.25 pounds of VOC (organic HAP)/day.

100(0.02) pounds of catalyst/day x 0.004 pound of VOC/pound catalyst = 0.01 pound of VOC/day.

30.26 pounds of VOC (organic HAP)/day x 365 days/year x 1 Ton/2000 pounds = 5.52 TPY of VOC (organic HAP).

P001, P003, P004, P005, P006, combined:

6.03 TPY of VOC + 12.06 TPY of VOC + 7.80 TPY of VOC + 16.57 TPY of VOC  
+ 5.52 TPY of VOC = 47.98 TPY of VOC.

g) Miscellaneous Requirements

(1) None.