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

6/22/2012

Certified Mail

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

John Covey
Plas-Tanks Industries, Inc.
39 Standen Drive
Hamilton, OH 45015-2209

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1409040850
Permit Number: P0110099
Permit Type: OAC Chapter 3745-31 Modification
County: Butler

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, Journal News. 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

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219

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 Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

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

Cc: U.S. EPA Region 5 -*Via E-Mail Notification*
SWOAQA; Indiana; Kentucky

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   Netting Determination

2. Source Description:

   Plas-Tanks Industries is a manufacturer of fiberglass storage tanks. The reinforced plastic composite production operations at this facility are defined as open molding processes using corrosion resistant/high strength resins. The permittee operates six (6) work stations identified as emissions units P001 through P006 which were installed in 1995. Emissions units P001, P002, P003, and P004 are the primary fabrication stations where filament application (winding) occurs in addition to the application of resins and gel coats utilizing mostly non-atomized spray application techniques. Emissions units P005 and P006 are fabrication stations where resin and/or gel coat is most often manually applied to fabricate tank parts and components.

   The permittee has submitted this application for a federally-enforceable permit-to-install (PTI) modification in order to increase production and material usage at the facility and to amend the existing permit terms following the removal of Ohio Administrative Code (OAC) rule 3745-21-07(G)(2) from the State Implementation Plan (SIP).

3. Facility Emissions and Attainment Status:

   The facility is located in Butler County, Ohio. Butler County is currently attainment for all criteria pollutants; however, effective July 20, 2012, the area will be considered marginal nonattainment for ozone pursuant to the recent US EPA re-designation for the 2008 ozone standard.

   Plas-tanks Industries is a minor source of volatile organic compound (VOC) emissions. The potential VOC emissions at this facility under the active PTI number P0104378, issued 3/24/2009, are 89.43 tons per year (TPY) of VOC, assuming all coating and cleanup materials employed to be VOC-containing materials. The major stationary source mass annual emission threshold level for a marginal ozone nonattainment area is 100 TPY of VOC. Without federally-enforceable permit limitations, potential facility-wide emissions are 527 TPY of VOC. Due to the changes in the SIP, the permittee requests federally-enforceable limitations in this permit modification to retain its minor source status under the new source review (NSR) rules for marginal nonattainment areas. Upon issuance of this federally-enforceable permit modification, the revised allowable emissions will be 95 TPY of VOC from coating operations (resin and gel coat application) and 64 TPY of non-VOC emissions from the use of acetone cleanup material.

   The facility is currently a major stationary source of hazardous air pollutants (HAPs) in the form of styrene and methyl methacrylate for purposes of both Title V operating permit requirements and being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart WWWW, as an existing major stationary source.

Actual mass emissions in 2011 from all the emissions units at this facility, combined, were 8.99 TPY of VOC from the coatings (resins/gel coats) and 9.62 TPY of OC (non-VOC) from the cleanup materials. Actual facility-wide material usage in 2011 was 295,704 pounds of resin, 5,988 pounds of gel coats, and 2,915 gallons of acetone.

4. Source Emissions:

The federally-enforceable VOC emission limitations and associated material usage limitations in this synthetic minor permit action are as follows:

PTI #P0110099:

Emissions units P001 – P006, combined: 95 TPY of VOC emissions, as a rolling 12-month summation;

Emissions units P001 – P006, combined: 64 TPY of OC emissions, as a rolling 12-month summation; and

Emissions units P001 – P006, combined: Material usage shall not exceed of 3,415,620 pounds of resin and 71,045 pounds of gel coat, based upon rolling 12-month summations.

5. Conclusion:

This PTI includes emission limitations, operational restrictions, monitoring requirements, record keeping requirements, reporting, and testing requirements sufficient to demonstrate compliance with OAC rules and the federally-enforceable requirements. Compliance with the federally-enforceable requirements will ensure that the facility maintains its status as a minor source under NSR. Actual emissions and material usage are less than the allowable permit limitations. Issuance of a draft PTI for this modification request is recommended.

6. Please provide additional notes or comments as necessary:

None

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

Pollutant	Tons Per Year
VOC	95
OC (non-VOC cleanup materials)	64

PUBLIC NOTICE
6/22/2012 Issuance of Draft Air Pollution Permit-To-Install

Plas-Tanks Industries, Inc.
39 Standen Drive,
Hamilton, OH 45015-2209
Butler County
FACILITY DESC.: All Other Plastics Product Manufacturing
PERMIT #: P0110099
PERMIT TYPE: OAC Chapter 3745-31 Modification
PERMIT DESC: Modification to increase and group facility-wide emissions for fiberglass storage tank fabrication operations and establsh federally-enforceable limitation to avoid major stationary source NSR status.

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

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install
for
Plas-Tanks Industries, Inc.

Facility ID:	1409040850
Permit Number:	P0110099
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	6/22/2012
Effective:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Plas-Tanks Industries, Inc.

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Authorization

Facility ID: 1409040850
Facility Description: Fabricator of fiberglass tanks
Application Number(s): A0043954
Permit Number: P0110099
Permit Description: Modification to increase and group facility-wide emissions for fiberglass storage tank fabrication operations and establsh federally-enforceable limitation to avoid major stationary source NSR status.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $1,200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 6/22/2012
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Plas-Tanks Industries, Inc.
39 Standen Drive
Hamilton, OH 45015-2209

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: P0110099
Permit Description: Modification to increase and group facility-wide emissions for fiberglass storage tank fabrication operations and establsh federally-enforceable limitation to avoid major stationary source NSR status.

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

Group Name: Fabrication Stations #1 - #6

Emissions Unit ID:	**P001**
Company Equipment ID:	Station #1
Superseded Permit Number:	P0104378
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	Station #2
Superseded Permit Number:	P0104378
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P003**
Company Equipment ID:	Station #3
Superseded Permit Number:	P0104378
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P004**
Company Equipment ID:	Station #4
Superseded Permit Number:	P0104378
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P005**
Company Equipment ID:	Station #5
Superseded Permit Number:	P0104378
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P006**
Company Equipment ID:	Station #6
Superseded Permit Number:	P0104378
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

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

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

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

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

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

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

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

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

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

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

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Southwest Ohio Air Quality Agency.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, 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, andreportingrequirements 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 enteredupon 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.

2. The following emission units contained in this permit are subject to 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants (NESHAP) Reinforced Plastic Composites Production: P001, P002, P003, P004, P005, and P006. The complete NESHAP requirements, including the NESHAP 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.

   The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart WWWW. The permittee shall also comply with all the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 15 of 40 CFR Part 63, Subpart WWWW. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart WWWW and Subpart A.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Fabrication Stations #1 - #6: P001, P002, P003, P004, P005, and P006

EU ID	Operations, Property and/or Equipment Description
P001	Station 1 - Fiberglass tank fabrication using spray, filament winding, and hand layup
P002	Station 2 - Fiberglass tank fabrication using spray, filament winding, and hand layup
P003	Station 3 - Fiberglass tank fabrication using spray, filament winding, and hand layup
P004	Station 4 - Fiberglass tank fabrication using spray, filament winding, and hand layup
P005	Station 5 - Fiberglass tank fabrication using spray, filament winding, and hand layup
P006	Station 6 - Fiberglass tank fabrication using spray, filament winding, and hand layup

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) *Best Available Technology*	For the application of coating materials (resins and gel coats), the requirements of this rule shall be demonstrated by compliance with the requirements of 40 CFR Part 63, Subpart WWWW, for open molding processes. Organic compound (OC) emissions shall not exceed 64 tons per year (TPY), as a rolling 12-month summation, from cleanup materials employed in emissions units P001, P002, P003, P004, P005, and P006, combined. See b)(2)a. and c)(1).
b.	OAC rule 3745-31-05(D) *Federally-Enforceable Limitations to Avoid Major Stationary Source Status under New Source Review*	Volatile organic compound (VOC) emissions shall not exceed 95 tons per year (TPY), as a rolling 12-month summation, from emissions units P001, P002, P003, P004, P005, and P006, combined. See c)(2).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-21-25 *Reasonably Available Control Technology Requirements for Reinforced Plastic Composites Production*	The requirements of this rule are equivalent to, or less stringent than, the requirements established pursuant to 40 CFR Part 63, Subpart WWWW, ORC 3704.03(T), and OAC rule 3745-31-05(D). The permittee has submitted the required applicability notification pursuant to OAC rule 3745-21-25(S).
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935) [In accordance with 63.5805(b), each emissions unit is an open molding corrosion resistant and/or high strength resin and gel coat operation at an existing reinforced plastic composites production facility subject to the emission limitations and work practices specified in 40 CFR 63.5805(b)]	Table 3 to 40 CFR Part 63, Subpart WWWW - Organic Hazardous Air Pollutant (HAP) Emission Limits for Specific Open Molding, Centrifugal Casting, Pultrusion, and Continuous Lamination/Casting Operations shows which emission limits apply to each emissions unit based upon the type of operation and the method of resin and gel coat application. See b)(2)b. for a listing of the specific emission limitations and c)(3) for compliance demonstration options. Table 4 to 40 CFR Part 63, Subpart WWWW- Applicable Work Practice Standards.
e.	40 CFR 63.1-15, Subpart A (40 CFR 63.5925)	Table 15 to 40 CFR Part 63, Subpart WWWW – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR Part 63.1-15 apply.

(2) Additional Terms and Conditions

a. The maximum OC content of the cleanup material employed in emissions units P001, P002, P003, P004, P005, and P006 shall not exceed 6.6 pounds of OC per gallon.

b. The following organic HAP emission limitations shall not be exceeded:

If your operation type is . . .	And you use . . .	[1]Your organic HAP emissions limit is . . .
1. open molding—corrosion-resistant and/or high strength (CR/HS)	a. mechanical resin application b. filament application c. manual resin application	113 lb/ton. 171 lb/ton. 123 lb/ton.
2. open molding—non-CR/HS	a. mechanical resin application b. filament application c. manual resin application	88 lb/ton. 188 lb/ton 87 lb/ton.
3. open molding—tooling	a. mechanical resin application b. manual resin application	254 lb/ton. 157 lb/ton.
4. open molding—low-flame spread/low-smoke products	a. mechanical resin application b. filament application c. manual resin application	497 lb/ton 270 lb/ton. 238 lb/ton.
5. open molding—shrinkage controlled resins[2]	a. mechanical resin application b. filament application c. manual resin application	354 lb/ton. 215 lb/ton. 180 lb/ton.
6. open molding—gel coat[3]	a. tooling gel coating b. white/off white pigmented gel coating c. all other pigmented gel coating d. CR/HS or high performance gel coat e. fire retardant gel coat f. clear production gel coat	440 lb/ton. 267 lb/ton. 377 lb/ton. 605 lb/ton. 854 lb/ton. 522 lb/ton.

[1]Organic HAP emissions limits for open molding and centrifugal casting are expressed as lb/ton. You must be at or below these values based on a 12-month rolling average.

[2]This emission limit applies regardless of whether the shrinkage controlled resin is used as a production resin or a tooling resin.

[3]If you only apply gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If you use multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, you may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.

c) Operational Restrictions

(1) The permittee shall employ only non-HAP/non-VOC-containing cleanup materials (i.e. acetone or other compliant material) in each emissions unit.

(2) The coating materials employed in emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed the following:

a. 3,415,620 pounds of resin based upon a rolling 12-month summation; and

b. 71,045 pounds of gel coat, based upon a rolling 12-month summation.

The emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-monthsummation of the coating material usage upon issuance of this permit.

(3) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935) for applicable work practice standards and operational restrictions.

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

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, and P006, combined:

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

b. The type of each resin and gel coat applied (non-vapor suppressed or vapor suppressed);

c. The number of pounds of each resin and gel coat applied by each method of application (i.e. manual, atomized mechanical, non-atomized mechanical, etc.);

d. The total monthly usage rates for all resins and all gel coats applied, in pounds per month [summation of the resin and gel coat usage as recorded in d)(1)c. above];

e. The rolling, 12-month summations of the monthly total resin usage and total gel coat usage, in pounds [summations of the coating material usage, as recorded in d)(1)d. above, for the present month plus the previous 11 months of operation];

f. The total weight percent of organic HAP of each resin and gel coat applied;

g. The calculated VOC (assumed equal to the organic HAP) emission factor using the equations to calculate organic HAP emission factors from Table 1 of 40 CFR Part 63, Subpart WWWW, in pounds of VOC per ton of resin or gel coat applied;

h. The total monthly VOC emission rate for all resins and gel coats applied, in pounds per month; and

i. The rolling,12-month summation of the monthly VOC emission rate, in tons [summation of the VOC emissions, as recorded in d)(1)h. above, for the present month plus the previous 11 months of operation, divided by 2,000 pounds].

(2) The permittee shall collect and record the following cleanup material information each month for emissions units P001, P002, P003, P004, P005, and P006, combined:

a. The company identification for each cleanup material employed;

b. The total number of gallons of cleanup material evaporated each month in emissions units P001, P002, P003, P004, P005, and P006, combined. Evaporated cleanup material is equal to [the amount of virgin solvent dispensed plus recycled cleanup solvent from the previous month] minus [the cleanup solvent left at the end of the month];

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

d. The monthly OC emission rate from cleanup materials evaporated, in pounds per month [d)(2)b. x d)(2)c.];

e. The rolling,12-month summation of the monthly OC emission rate from cleanup materials employed, in tons [summation of the OC emissions, as recorded in d)(2)d. above, for the present month plus the previous 11 months of operation, divided by 2,000 pounds];

f. A record of each liquid organic cleanup material employed in this emissions unit indicating whether or not the liquid organic material contains VOCs or HAPs as identified in Section 112(b) of the Clean Air Act;

g. The permittee may record the evaporation of cleanup materials in pounds per month, instead of gallons as specified in d)(2)b. above, if the cleanup materials are weighed; and

h. The permittee shall retain records of cleanup material analyses for the solvent and solids content of cleanup material sent out for disposal.

The permittee has existing cleanup material records; therefore, cumulative cleanup material emission limitations are not needed for the first year of operation after issuance of this permit.

(3) The permittee shall operate and maintain metering equipment to measure the amount of all resins and gel coats used in each emissions unit. The permittee shall calibrate the metering equipment to measure the amount, in weight or volume, of all resins and gel coats used in each emissions unit as necessary or appropriate to maintain the accuracy of the measurements guaranteed or specified by the manufacturer of the metering equipment, or to an accuracy of within plus or minus five percent (5%) of the true value, whichever is more stringent.

Calibration and accuracy tests consistent with the metering equipment manufacturer specifications shall be conducted semi-annually. If the manufacturer does not warrant or specify the calibration data or the accuracy of the material measurements for the metering equipment, the permittee shall perform calibration and accuracy tests on the metering equipment on a monthly basis during the first six months of operation of the meters. The permittee calibration and accuracy tests for the metering equipment shall include two resins (the highest and lowest density resins) and two gel coats (the highest and lowest density gel coats). After completing six months of calibration and accuracy tests of the metering equipment and upon approval from the Hamilton County Department of Environmental Services, the permittee shall conduct calibration and accuracy tests semi-annually.

(4) The permittee shall operate and maintain measuring equipment to measure the amount of cleanup materials employed in emissions units P001 through P006. The permittee shall calibrate the measuring equipment to measure the amount, in weight or volume, of all cleanup materials employed in emissions units P001 through P006 as necessary or appropriate to maintain the accuracy of the measurements guaranteed or specified by the manufacturer of the measuring equipment, or to an accuracy of within plus or minus five percent (5%) of the true value, whichever is more stringent.

Calibration and accuracy tests consistent with the measuring equipment manufacturer specifications shall be conducted semi-annually. If the manufacturer does not warrant or specify the calibration data or the accuracy of the material measurements for the measuring equipment, the permittee shall perform calibration and accuracy tests on the measuring equipment on a monthly basis during the first six months of operation of the measuring equipment. The permittee calibration and accuracy tests for the measuring equipment shall include the cleanup material employed by the permittee. After completing six months of calibration and accuracy tests of the measuring equipment and upon approval from the Hamilton County Department of Environmental Services, the permittee shall conduct calibration and accuracy tests semi-annually.

(5) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935) for applicable monitoring and record keeping requirements.

e) Reporting Requirements

(1) 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.

(2) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. An identification of all exceedances of the rolling, 12-month coating material usage limitations for resins and gel coats applied for emissions units P001, P002, P003, P004, P005, and P006, combined;

b. An identification of all exceedances of the rolling, 12-month VOC emission limitation of 95 TPY for emissions units P001, P002, P003, P004, P005, and P006, combined;

c. An identification of any monthly record indicating VOC-containing and/or HAP-containing cleanup material was employed in an emissions unit, and the type of cleanup material employed for each such incident;

d. An identification of all exceedances of the OC content limitation for cleanup materials of 6.6 pounds of OC per gallon; and

e. An identification of all exceedances of the rolling, 12-month OC emission limitation of 64 TPY for cleanup materials employed by emissions units P001, P002, P003, P004, P005, and P006, combined.

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

(3) Upon replacement and/or initial operation of any metering or measuring equipment as specified in d)(3) and d)(4) of this permit, the permittee shall provide the Hamilton County Department of Environmental Services the following information: the name of the manufacturer of the metering/measuring equipment, the make and model of the metering/measuring equipment, calibration data (e.g., volume of coating per pump stroke), a copy of the manufacturer's specifications and warranty for the accuracy of the metering/measuring equipment and the actual accuracy of the material measurements (by weight or by volume) recorded for the metering/measuring equipment.

(4) The permittee shall submit calibration and accuracy test results for the metering equipment and measuring equipment specified in d)(3) and d)(4) of the terms and conditions of this permit. The calibration and accuracy tests results shall be submitted to the Hamilton County Department of Environmental Services by January 30 and July 30 of each calendar year, and shall cover the previous six-month period.

(5) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935) for applicable reporting requirements.

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 Limitation:

The maximum OC content of the cleanup material employed in emissions units P001, P002, P003, P004, P005, and P006 shall not exceed 6.6 pounds of OC per gallon.

Applicable Compliance Method:

Compliance with the OC content emission limitation for cleanup materials shall be based upon the record keeping specified in d)(2).

U.S. EPA Method 24 or manufacturer formulation data shall be used to determine the OC content of the cleanup materials.

b. Emission Limitation:

The maximum annual VOC emissions from emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 95 TPY OC, as a rolling 12-month summation.

Applicable Compliance Method:

Compliance with the rolling 12-month VOC emission limitation shall be based upon the record keeping specified in d)(1).

c. Emission limitation:

The maximum annual OC emissions from cleanup materials employed by emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 64 TPY OC, as a rolling 12-month summation.

Applicable Compliance Method:

Compliance with the rolling 12-month OC emission limitation for cleanup materials employed shall be based upon the record keeping specified in d)(2).

d. Emission Limitation:

Table 3 to 40 CFR Part 63, Subpart WWWW - Organic Hazardous Air Pollutant (HAP) Emission Limits for Specific Open Molding, Centrifugal Casting, Pultrusion, and Continuous Lamination/Casting Operations shows which emission limits apply to each emissions unit based upon the type of operation and the method of resin and coating application. [40 CFR 63.5805(b)]

Applicable Compliance Method:

Compliance with the organic HAP emission limitations found in 40 CFR Part 63, Subpart WWWW, shall be based upon the compliance demonstration utilized by the permittee as specified in c)(4) of this permit and the record keeping specified in 40 CFR Part 63.5780-5935 and d)(1) of this permit.

(2) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935) for applicable compliance procedures and performance test methods.

(3) Compliance with the operational restrictions specified in c)(1) and c)(2) of the terms and conditions shall be determined by the record keeping requirements in d)(1) and d)(2).

g) Miscellaneous Requirements

(1) None.