

7/3/2012

Certified Mail

Mike Nagra  
JMS Composites  
BOX 507  
SPRINGFIELD, OH 45501

Facility ID: 0812790457  
Permit Number: P0109286  
County: Clark

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT  
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 5/31/2012. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. 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. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

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

and Regional Air Pollution Control Agency  
117 South Main Street  
Dayton, OH 45422-1280

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,



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

Cc: Regional Air Pollution Control Agency





## Response to Comments

Facility ID:	0812790457
Facility Name:	JMS Composites
Facility Description:	plastics
Facility Address:	BOX 507 SPRINGFIELD, OH 45501 Clark County
Permit:	P0109286, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Springfield News Sun on 06/02/2012. The comment period ended on 07/02/2012.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

**1. Topic: None**

- a. Comment: None
- b. Response: None

**No comments were received on Draft permit 07/02/2012.**





## **PRELIMINARY PROPOSED**

### **Division of Air Pollution Control Title V Permit for JMS Composites**

Facility ID:	0812790457
Permit Number:	P0109286
Permit Type:	Renewal
Issued:	7/3/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





Division of Air Pollution Control
Title V Permit
for
JMS Composites

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## Authorization

Facility ID: 0812790457

Facility Description: plastics

Application Number(s): A0043524, A0043703

Permit Number: P0109286

Permit Description: Renewal Title V operating permit for fiberglass reinforced plastics parts manufacturer.

Permit Type: Renewal

Issue Date: 7/3/2012

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Superseded Permit Number: P0091718

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

JMS Composites  
BOX 507  
SPRINGFIELD, OH 45501

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

Regional Air Pollution Control Agency  
117 South Main Street  
Dayton, OH 45422-1280  
(937)225-4435

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
Director



## **A. Standard Terms and Conditions**



## 1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
  - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
  - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
  - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

*(Authority for term: ORC 3704.036(A))*

## 2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.

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

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

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

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

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

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

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

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

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

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

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive

measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

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

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

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



insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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

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

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

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

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

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

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Regional Air Pollution Control Agency.

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

### 3. Scheduled Maintenance

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

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

### 4. Risk Management Plans

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



- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

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

## **5. Title IV Provisions**

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

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

## **6. Severability Clause**

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

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

## **7. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the



Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

- (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
- (2) a combination of (1) and (2) above.

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

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

## 8. Fees

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

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

## 9. Marketable Permit Programs

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

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

## 10. Reasonably Anticipated Operating Scenarios

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

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

## 11. Reopening for Cause

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

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

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

## 12. Federal and State Enforceability

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

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

## 13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

- (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (3) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
  - (2) Compliance certifications shall include the following:
    - a. An identification of each term or condition of this permit that is the basis of the certification.
    - b. The permittee's current compliance status.
    - c. Whether compliance was continuous or intermittent.
    - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
  - (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

**14. Permit Shield**

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

**15. Operational Flexibility**

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

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

**16. Emergencies**

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

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

**17. Off-Permit Changes**

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

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that

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

- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

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

#### **18. Compliance Method Requirements**

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

*(This term is provided for informational purposes only.)*

#### **19. Insignificant Activities or Emissions Levels**

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

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

#### **20. Permit to Install Requirement**

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

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

**21. Air Pollution Nuisance**

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

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

**22. Permanent Shutdown of an Emissions Unit**

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

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

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

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

**23. Title VI Provisions**

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

- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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



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

The permittee shall submit required reports in the following manner:

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

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.

**25. Inspections and Information Requests**

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

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

**26. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air

agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**27. Permit Transfers**

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

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

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

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

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

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

## **B. Facility-Wide Terms and Conditions**



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

- a) None.

2. 40 CFR Part 63, Subpart WWWW

The following emissions units contained in this permit are subject to 40 CFR, Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production: P001 through P006. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart WWWW. JMS Industries Inc. dbaGlasgo Plastics is an "existing" major source per the definitions of the Subpart WWWW with a compliance date of three years after the promulgation date of April 21, 2003 (i.e., April 21, 2006).

[Authority for term: 40 CFR, Part 63, Subpart WWWW]

3. 40 CFR Part 63, Subpart A

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.

[Authority for term: 40 CFR, Part 63, Subpart WWWW]

## **C. Emissions Unit Terms and Conditions**



1. Emissions Unit Group -grinding: P007,P008,

EU ID	Operations, Property and/or Equipment Description
P007	fiberglass reinforced plastic grinding booths
P008	fiberglass reinforced plastic grinding booths

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) (PTI 08-01941 issued 8/1/1990)	The visible particulate emissions (PE) from each emission unit shall not exceed 5% opacity, as a six-minute average.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B) and 3745-17-07(A)(1).
b.	OAC rule 3745-17-11(B)(1)	The PE shall not exceed 0.551 lb/hour.
c.	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall employ a fiberglass filter while this emissions unit is in operation.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-1941]

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee operates this emissions unit without a fiberglass filter, the permittee shall maintain a record of the number of hours the emissions unit operated and the amount of grinding done.

[Authority for Term: OAC rule 3745-77-07(A)(3)]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when the emissions unit operated without a fiberglass filter. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for Term: OAC rule 3745-77-07(A)(3)]

f) Testing Requirements

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

a. Emission Limitation -

Particulate emissions shall not exceed 0.551 lb/hour.

Applicable Compliance Method -

If required, compliance with the hourly particulate limitation shall be determined in accordance with the methods in OAC rule 3745-17-03(B)(10).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-1941]

b. Emission Limitation -

Visible particulate emissions shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method -

Compliance shall be determined by visible emission evaluations performed in accordance with procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-1941]

g) Miscellaneous Requirements

- (1) None.

2. Emissions Unit Group -hand layup resin application: P005,P006,

EU ID	Operations, Property and/or Equipment Description
P005	fiberglass reinforced plastic north hand layup area
P006	fiberglass reinforced plastic south hand layup area

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) (PTI 08-02949 issued 10/26/2000)	Organic compound (OC) emissions from each unit shall not exceed 40 lbs/day and 7.3 TPY, including cleanup.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-25, and 40 CFR Part 63 Subparts WWWW and A.
b.	OAC rule 3745-21-25	The requirements and limitations specified by this rule are equivalent to or less stringent than the requirements and limitations specified in 40 CFR Part 63, Subpart WWWW. See b)(2)a.
c.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930)  [In accordance with 40 CFR 63.5795(a), this facility is an existing reinforced plastic composites production facility.]	Organic Hazardous Air Pollutants (HAP) Emissions Limitation Standards – 40 CFR 63.5796 through 63.5799 – See b)(2)b.  Workplace Practice Standards – 40 CFR 63.5805(a) – See b)(2)c.  See Section B.2 of Facility-Wide Terms and Conditions, b)(2)b through b)(2)d, d)(2), d)(3), e)(2), f(1)(c) and f)(2).
d.	40 CFR Part 63 Subpart A	See Section B.3 of Facility-Wide Terms and Conditions.

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(2) Additional Terms and Conditions

- a. By complying with 40 CFR Part 63, Subpart WWWW the facility will be in compliance this OAC rule 3745-21-25.
- b. Based on application technique and material properties, the organic HAP emissions limitation standards specified in the following section of 40 CFR 63 Subpart WWWW, are applicable to these emissions units, and shall not be exceeded.

63.5805(a)	Organic HAP Emissions Limitations in Table 3 of this subpart. [See items 1 through 6 for open molding operations.]
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The permittee shall demonstrate compliance with these emissions limitations based on compliance options selected in d)(3) and specified under 40 CFR, Part 63, Subpart WWWW:

63.5810	Options for meeting the emission standards for open molding operations at new or existing sources.
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- c. The permittee shall comply with the following applicable work practice standards under 40 CFR, Part 63, Subpart WWWW:

63.5805(a)	Work Practice Standards in Table 4 of this subpart.
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- d. The permittee shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5796	Organic HAP emissions factor equations in Table 1 of this subpart and how they are used in this subpart.
63.5797	Determination of organic HAP content of resins and gel coats.
63.5798	Use or manufacture an application technology (new or existing) whose organic HAP emissions characteristics are not represented by the equations in Table 1 of this subpart.
63.5799	Calculating facility's organic HAP emissions on a ton per year basis for purposes of determining which paragraphs of 63.5805 apply.
63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each day for each resin, gelcoat resin, catalyst, resin flush, primer/thinner, and cleanup material employed in this emissions unit:
  - a. The company identification for each material employed.
  - b. The total number of gallons of each material employed.
  - c. The organic compound content of each material, in pounds per gallon.
  - d. The method of application for each resin employed.
  - e. The styrene content of each resin employed, in percent by weight.
  - f. The total daily organic compound emissions, in pounds (see calculation methodology in f)(1)a.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-02949]

- (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 this subpart, as described in the following sections:

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

[Authority for term: OAC rule 3745-77-07(A)(3) and 40 CFR 63.5810]

- (3) The permittee shall comply with the applicable monitoring and recordkeeping requirements, keep records of deviations from the applicable standards, and demonstrate compliance with the applicable standards under 40 CFR, Part 63, Subpart WWWW, including the following sections:

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63.5895(c) and (d)	How to monitor and collect data to demonstrate continuous compliance.
63.5915(a), (c) and (d)	Records that must be kept.
63.5900(a) through (c)	How to demonstrate continuous compliance with the standards.
53.5920	In what form and for how long records must be kept.

[OAC rules 3745-77-07(A)(3), and 40 CFR Part 63, Subpart WWWW]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. identification of each day during which the organic compound emissions from the resin, catalyst, resin flush, and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day; and
  - b. identification of any instance which the recordkeeping of the compliance option used in d)(3) indicates non-compliance with an applicable organic HAP emissions limitation standard specified in section 63.5805(a) of 40 CFR 63 Subpart WWWW.

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

[Authority for Term: OAC rule 3745-77-07(A)(3), PTI 08-02949, and PTI 08-1875]

- (2) The permittee shall submit notifications and semiannual reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a)	Applicable reports contained in Table 14 of Subpart WWW that that must be submitted.
63.5905(b)	15-day notification of change(s)
63.5910(a) - (b) and Table 14	Semi-annual compliance reports.
63.5910(c) - (i) and Table 14	Content of semi-annual compliance reports.

[Authority for term: OAC rule 3745-77-07(A)(3) and 40 CFR Part 63, Subpart WWWW]

f) Testing Requirements

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

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a. Emission Limitation -

Organic compound emissions from each unit shall not exceed 40 lbs/day, including cleanup.

Applicable Compliance Method -

This limitation was established in the PTI for these emissions units and determined as follows by using the most often used application type with the maximum organic compound resin content:

- i. The usage of each gelcoat resin (gallons per day), as required to be recorded in d)(1), shall be multiplied by the gelcoat resin density, in pounds per gallon, and then divided by 2,000 pounds per ton. The usage of each gelcoat resin, in tons, shall then be multiplied by the appropriate emission factor from Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001.
- ii. The total usage rate of the catalyst (gallons per day), as required to be recorded in d)(1), shall be multiplied by the maximum organic compound content of the catalyst, in pounds per gallon.
- iii. The total usage rate of the resin flush (gallons per day), as required to be recorded in d)(1), shall be multiplied by the maximum organic compound content of the resin flush, in pounds per gallon. The product shall then be multiplied by a company-derived mass balance emission factor of 0.25.
- iv. The total usage rate of the cleanup material (gallons per day), as required to be recorded in d)(1), shall be multiplied by the organic compound content of the cleanup material, in pounds per gallon.
- v. The total usage rate of the primer/thinner (gallons per day), as required to be recorded in d)(1), shall be multiplied by the maximum organic compound content of the primer/thinner, in pounds per gallon.
- vi. The total daily organic compound emission rate (in pounds), including cleanup, shall then be the sum of the results from i, ii, iii, iv, and v.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-02949]

b. Emission Limitation -

Organic compound emissions from each unit shall not exceed 7.3 TPY, including cleanup.

Applicable Compliance Method -

This limitation was determined by multiplying the daily emissions limitation by 265 days and dividing by 2000 lbs/ton. Compliance shall be based upon

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summing the daily organic compound emission rates (pounds), as determined in d)(1) for the calendar year, and then dividing by 2,000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-02949]

c. Emission Limitation -

Based on application technique and material properties, the organic HAP emission limitations specified in Table 3 of 40 CFR 63 Subpart WWWW, are applicable to these emissions units, shall not be exceeded.

63.5805(a)	Organic HAP Emission Limitations in Table 3 of this subpart. [See items 1 through 6 for open molding operations.]
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Applicable Compliance Method -

Compliance with the organic HAP emission limitation shall be based upon the information collected and recorded in d)(2) and d)(3) of this permit.

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

- (2) The permittee shall comply with the applicable compliance requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements
63.5900(a) through (c)	Continuous compliance requirements.

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

- (3) Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the materials employed in this emissions unit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-02949]

g) Miscellaneous Requirements

- (1) This permit allows the use of the materials specified by the permittee in the Title V application. Prior to employing any material not specified in the Title V application, the permittee shall provide written notification to, and obtain approval from, the Director (the appropriate Ohio EPA District Office or local air agency). Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in this permit. This notification, at a minimum, shall include the company identification of the new material to be employed, the organic compound content of the material, and the maximum amount to be used, in pounds per hour.

[Authority for term: OAC rule 3745-77-07(A)(3) and PTI 08-02949]

3. Emissions Unit Group -spray booth resin application: P001,P002,P003,P004,

EU ID	Operations, Property and/or Equipment Description
P001	fiberglass reinforced plastic chopper resin spray booth 1, with filter
P002	fiberglass reinforced plastic chopper resin spray booth 2, with filter
P003	fiberglass reinforced plastic gelcoat spray booth 3, with filter
P004	combination primer/gelcoat/chopper spray booth, with filter

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) (PTI 08-02949 issued 10/26/2000 for P001- P003) (PTI 08-01875 issued 5/9/2006 for P004)	Organic compound (OC) emissions from each unit shall not exceed 40 lbs/day and 7.3 TPY, including cleanup.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B)(1), 3745-17-07(A), and 3745-21-25, and 40 CFR Part 63 Subparts WWWW and A.
b.	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) from each emission unit shall not exceed 1.58 lbs/hour.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions from each emission unit shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
d.	OAC rule 3745-21-25	The requirements and limitations specified by this rule are equivalent to or less stringent than the requirements and limitations specified in 40 CFR Part 63, Subpart WWWW. See b)(2)a.
e.	40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5930)	Organic Hazardous Air Pollutants (HAP) Emissions Limitation Standards – 40 CFR 63.5796 through 63.5799 – See b)(2)b.

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[In accordance with 40 CFR 63.5795(a), this facility is an existing reinforced plastic composites production facility.]	Workplace Practice Standards – 40 CFR 63.5805(a) – See b)(2)c.  See Section B.2 of Facility-Wide Terms and Conditions, b)(2)b through b)(2)d, d)(3), d)(4), e)(2), f(1)(e) and f)(2).
f.	40 CFR Part 63 Subpart A	See Section B.3 of Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

- a. By complying with 40 CFR Part 63, Subpart WWWW the facility will be in compliance this OAC rule 3745-21-25.
- b. Based on application technique and material properties, the organic HAP emissions limitation standards specified in the following section of 40 CFR 63 Subpart WWWW, are applicable to these emissions units, and shall not be exceeded.

63.5805(a)	Organic HAP Emissions Limitations in Table 3 of this subpart. [See items 1 through 6 for open molding operations.]
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The permittee shall demonstrate compliance with these emissions limitations based on compliance options selected in d)(4) and specified under 40 CFR, Part 63, Subpart WWWW:

63.5810	Options for meeting the emission standards for open molding operations at new or existing sources.
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- c. The permittee shall comply with the following applicable work practice standards under 40 CFR, Part 63, Subpart WWWW:

63.5805(a)	Work Practice Standards in Table 4 of this subpart.
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- d. The permittee shall comply with the following applicable requirements under 40 CFR, Part 63, Subpart WWWW:

63.5796	Organic HAP emissions factor equations in Table 1 of this subpart and how they are used in this subpart.
63.5797	Determination of organic HAP content of resins and gel coats.

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63.5798	Use or manufacture an application technology (new or existing) whose organic HAP emissions characteristics are not represented by the equations in Table 1 of this subpart.
63.5799	Calculating facility's organic HAP emissions on a ton per year basis for purposes of determining which paragraphs of 63.5805 apply.
63.5800	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.

c) Operational Restrictions

- (1) The permittee shall operate the associated filter system for each emissions unit whenever the emissions unit is in operation.

[Authority for Term: OAC rule 3745-77-07(A)(1), PTI 08-02949 and PTI 08-1875]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each day for each resin, gelcoat resin, catalyst, resin flush, primer/thinner, and cleanup material employed in this emissions unit:

- a. The company identification for each material employed.
- b. The total number of gallons of each material employed.
- c. The organic compound content of each material, in pounds per gallon.
- d. The method of application for each resin employed.
- e. The styrene content of each resin employed, in percent by weight.
- f. The total daily organic compound emissions, in pounds (see calculation methodology in f)(1)a.

[Authority for Term: OAC rule 3745-77-07(A)(3), PTI 08-02949, and PTI 08-1875]

- (2) The permittee shall maintain daily records that document any periods of time when the associated filter system for each emissions unit was not in service when the emissions unit was in operation.

[Authority for Term: OAC rule 3745-77-07(A)(3), PTI 08-02949, and PTI 08-1875]

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

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

[Authority for term: OAC rule 3745-77-07(A)(3) and 40 CFR 63.5810]

- (4) The permittee shall comply with the applicable monitoring and recordkeeping requirements, keep records of deviations from the applicable standards, and demonstrate compliance with the applicable standards under 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5895(c) and (d)	How to monitor and collect data to demonstrate continuous compliance.
63.5915(a), (c) and (d)	Records that must be kept.
63.5900(a) through (c)	How to demonstrate continuous compliance with the standards.
53.5920	In what form and for how long records must be kept.

[OAC rules 3745-77-07(A)(3), and 40 CFR Part 63, Subpart WWWW]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. identification of each day during which the organic compound emissions from the resin, catalyst, resin flush, and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day;
  - b. identification of each day when the emissions unit operated without a fiberglass filter; and
  - c. identification of any instance which the recordkeeping of the compliance option used in d)(3) indicates non-compliance with an applicable organic HAP emissions limitation standard specified in section 63.5805(a) of 40 CFR 63 Subpart WWWW.

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

[Authority for Term: OAC rule 3745-77-07(A)(3), PTI 08-02949, and PTI 08-1875]

- (2) The permittee shall submit notifications and semiannual reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(a)	Applicable reports contained in Table 14 of Subpart WWWW that that must be submitted.
63.5905(b)	15-day notification of change(s).
63.5910(a) - (b) and Table 14	Semi-annual compliance reports.
63.5910(c) - (i) and Table 14	Content of semi-annual compliance reports.

[Authority for term: OAC rule 3745-77-07(A)(3) and 40 CFR Part 63, Subpart WWWW]

f) Testing Requirements

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

a. Emission Limitation -

Organic compound emissions from each unit shall not exceed 40 lbs/day, including cleanup.

Applicable Compliance Method -

This limitation was established in the PTI for these emissions units and determined as follows by using the most often used application type with the maximum organic compound resin content:

- i. The usage of each gelcoat resin (gallons per day), as required to be recorded in d)(1), shall be multiplied by the gelcoat resin density, in pounds per gallon, and then divided by 2,000 pounds per ton. The usage of each gelcoat resin, in tons, shall then be multiplied by the appropriate emission factor from Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001.
- ii. The total usage rate of the catalyst (gallons per day), as required to be recorded in d)(1), shall be multiplied by the maximum organic compound content of the catalyst, in pounds per gallon.
- iii. The total usage rate of the resin flush (gallons per day), as required to be recorded in d)(1), shall be multiplied by the maximum organic compound

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content of the resin flush, in pounds per gallon. The product shall then be multiplied by a company-derived mass balance emission factor of 0.25.

- iv. The total usage rate of the cleanup material (gallons per day), as required to be recorded in d)(1), shall be multiplied by the organic compound content of the cleanup material, in pounds per gallon.
- v. The total usage rate of the primer/thinner (gallons per day), as required to be recorded in d)(1), shall be multiplied by the maximum organic compound content of the primer/thinner, in pounds per gallon.
- vi. The total daily organic compound emission rate (in pounds), including cleanup, shall then be the sum of the results from i, ii, iii, iv, and v.

Compliance shall be based upon record keeping as specified in section d).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-02949, and PTI 08-1875]

b. Emission Limitation -

Organic compound emissions from each unit shall not exceed 7.3 TPY, including cleanup.

Applicable Compliance Method -

This limitation was determined by multiplying the daily emissions limitation by 265 days and dividing by 2000 lbs/ton. Compliance shall be based upon summing the daily organic compound emission rates (pounds), as determined in d)(1) for the calendar year, and then dividing by 2,000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 08-02949, and PTI 08-1875]

c. Emission Limitation -

Particulate emissions shall not exceed 1.58 lbs/hour.

Applicable Compliance Method -

To determine the actual worst case emissions rate for particulates, the following equation shall be used:

$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1 - TE) \times (1 - CE)$

$E = \text{particulates emission rate (lbs/hour)}$

$TE = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used}$

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CE = control efficiency of the control equipment

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 08-02949, and PTI 08-1875]

d. Emission Limitation -

Visible particulate emissions shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method -

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 08-02949, and PTI 08-1875]

e. Emission Limitation -

Based on application technique and material properties, the organic HAP emission limitations specified in Table 3 of 40 CFR 63 Subpart WWWW, are applicable to these emissions units, shall not be exceeded.

63.5805(a)	Organic HAP Emission Limitations in Table 3 of this subpart. [See items 1 through 6 for open molding operations.]
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Applicable Compliance Method -

Compliance with the organic HAP emission limitation shall be based upon the information collected and recorded in d)(3) and d)(4) of this permit.

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

- (2) The permittee shall comply with the applicable compliance requirements as required under 40 CFR, 63 Subpart WWWW, including the following sections:

63.5835(a) and (c)	General compliance requirements.
63.5900(a) through (c)	Continuous compliance requirements.

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

- (3) Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the materials employed in this emissions unit.

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

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g) Miscellaneous Requirements

- (1) This permit allows the use of the materials specified by the permittee in the Title V application. Prior to employing any material not specified in the Title V application, the permittee shall provide written notification to, and obtain approval from, the Director (the appropriate Ohio EPA District Office or local air agency). Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in this permit. This notification, at a minimum, shall include the company identification of the new material to be employed, the organic compound content of the material, and the maximum amount to be used, in pounds per hour.

[Authority for term: OAC rule 3745-77-07(A)(3), PTI 08-02949, and PTI 08-1875]