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

8/27/2012

Certified Mail

Facility ID: 1483040411
Permit Number: P0110479
County: Warren

Michael Rundle
Marble Arch Products Inc.
263 Industrial Drive
Franklin, OH 45005

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Initial

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Western Star. A copy of the public notice, the Statement of Basis, 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 processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

Michael W. Ahern

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

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

PUBLIC NOTICE
8/27/2012 Issuance of Draft Air Pollution Title V Permit

Marble Arch Products Inc.
263 Industrial Drive,
Franklin, OH 45005
Warren County
FACILITY DESC.: All Other Plastics Product Manufacturing
PERMIT #: P0110479
PERMIT TYPE: Initial
PERMIT DESC: Initial Title V Operating Permit for an existing reinforced plastic composites production facility that includes the following operations: pouring area of marble castings; facility-wide clean-up material operation; and gel coat spray booth.

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

Statement of Basis For Air Pollution Title V Permit

Facility ID:	1483040411
Facility Name:	Marble Arch Products, Inc.
Facility Description:	Reinforced plastic composites production facility
Facility Address:	263 Industrial Drive Franklin, OH 45005
Permit #:	P0110479, Initial

This facility is subject to Title V because it is major for:

☐ Lead ☐ Sulfur Dioxide ☐ Carbon Monoxide ☐ Volatile Organic Compounds ☐ Nitrogen Oxides

☐ Particulate Matter ≤ 10 microns ☒ Single Hazardous Air Pollutant ☒ Combined Hazardous Air Pollutants

☒ Maximum Available Control Technology Standard(s): WWWW

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes. All insignificant emission units (IEUs) at this facility are excluded from the requirements to obtain installation or operating permits pursuant to OAC rules 3745-15-05 and 3745-31-03. In addition, these IEUs have no applicable federally enforceable requirements; therefore, the IEUs are not included in the terms and conditions of this permit pursuant to OAC rule 3745-77-07(A)(13).
Were there any common control issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A

Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.2.	N	40 CFR Part 63, Subpart WWWW	Permittee is subject to 40 CFR Part 63, Subpart WWWW for Renforced Plastic Composites Production. Affected emission units: P001, P002, and R001.

C Emissions Unit Terms and Conditions

Key:
EU = emissions unit ID
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)
OR = operational restriction
M = monitoring requirements
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
ENF = did noncompliance issues drive the monitoring requirements?
R = record keeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
Misc = miscellaneous requirements

EU(s)	Limitation	Basis		N	OR	M	St	E	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P001	Emissions of VOC shall not exceed 40.18 pounds per day	N	3745-31-05(A)(3)	N	N	N	N	N	N	N	N	N	N		M, R, Rp, ET: Emission limitation(s) are based on the emission unit's potential to emit. All of the requirements from the PTI have been transferred to this permit.
	Emissions of PE and PM10/PM2.5 shall not exceed 1.40 pounds per hour	N	3745-31-05(A)(3)	N	N	N	N	N	N	N	N	N	N		M, R, Rp, ET: Emission limitation(s) are based on the emission unit's potential to emit. All of the requirements from the PTI have been transferred to this permit.
	Emissions of VOC shall not exceed 7.33 TPY	N	3745-31-05(A)(3) and 3745-31-05(C)	N	N	N	N	N	N	N	N	N	N		M, R, Rp, ET: Emission limitation(s) are based on the emission unit's potential to emit. All of the requirements from the PTI have been transferred to this permit. Applicable deviation Rp will be through Standard T/Cs if necessary. Fee Report will include annual actual emissions total.
	Emissions of PE and PM10/PM2.5 shall not exceed 6.13 TPY	N	3745-31-05(A)(3) and 3745-31-05(C)	N	N	N	N	N	N	N	N	N	N		M, R, Rp, ET: Emission limitation(s) are based on the emission unit's potential to emit. All of the requirements from the PTI have been transferred to this permit. Applicable deviation Rp will be through Standard T/Cs if necessary. Fee Report will include annual actual emissions total.
	The maximum styrene content of	N	3745-31-05(A)(3) and	N	N	Y	N	N	Y	N	Y	N	N		ET: Compliance with emission limitation determined by monitoring and record keeping requirements. All of the

	resins used in this emissions unit shall not exceed 31% by weight		3745-31-05(C)												requirements from the PTI have been transferred to this permit.
	Various work practice standards	3745-21-25(A) through (S)	40 CFR Part 63 WWWW	N	N	Y	N	N	Y	N	Y	N	N		ET: Compliance with emission limitation determined by monitoring and record keeping requirements. All of the requirements from the PTI have been transferred to this permit.
P002	Emissions of OC shall not exceed 99.15 pounds per day	N	3745-31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N		ET: Compliance with emission limitation determined by monitoring and record keeping requirements. All of the requirements from the PTI have been transferred to this permit. Applicable deviation Rp will be through Standard T/Cs if necessary.
	Emissions of VOC shall not exceed 7.25 pounds per day	N	3745-31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N		ET: Compliance with emission limitation determined by monitoring and record keeping requirements. All of the requirements from the PTI have been transferred to this permit. Applicable deviation Rp will be through Standard T/Cs if necessary.
	Emissions of OC shall not exceed 9.20 TPY	N	3745-31-05(A)(3) and 3745-31-05(C)	N	N	Y	N	N	Y	N	Y	N	N		ET: Compliance with emission limitation determined by monitoring and record keeping requirements. All of the requirements from the PTI have been transferred to this permit. Applicable deviation Rp will be through Standard T/Cs if necessary.
	Emissions of VOC shall not	N	3745-31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N		ET: Compliance with emission limitation determined by monitoring and record

	exceed 0.02 TPY		and 3745-31-05(C)												keeping requirements. All of the requirements from the PTI have been transferred to this permit. Applicable deviation Rp will be through Standard T/Cs if necessary.
	The maximum OC content of each non-HAP/non-VOC cleanup material employed in this emissions unit shall not exceed 6.61 pounds of OC per gallon, as applied. The maximum VOC content of each HAP/VOC cleanup material employed in this emissions unit shall not exceed 7.25 pounds of VOC per gallon, as applied.	N	3745-31-05(A)(3) and 3745-31-05(C)	N	N	Y	N	N	Y	N	Y	N	N		ET: Compliance with emission limitation determined by monitoring and record keeping requirements. All of the requirements from the PTI have been transferred to this permit. Applicable deviation Rp will be through Standard T/Cs if necessary.
	Do not use cleaning	3745-21-		N	N	Y	N	N	Y	N	Y	N	N		ET: Compliance with emission limitation determined by monitoring and record

	solvents (cleaners) that have a VOC content greater than 0.42 pound VOC per gallon, except cleaners used in closed systems and used to clean cured resin from application equipment	25(A) through (S)													keeping requirements. All of the requirements from the PTI have been transferred to this permit.
	Various work practice standards	3745-21-25(A) through (S)	40 CFR Part 63 WWWW	N	N	Y	N	N	Y	N	Y	N	N		ET: Compliance with emission limitation determined by monitoring and record keeping requirements. All of the requirements from the PTI have been transferred to this permit.
R001	Emissions of organic HAPs from an open molding gel coating operation shall not exceed the following in pounds per ton (lbs/ton) of gel coat applied:	3745-21-25(A) through (S)	3704.03(T) & 40 CFR Part 63 WWWW	N	N	Y	N	N	Y	N	Y	N	N		ET: Compliance with emission limitation determined by monitoring and record keeping requirements. All of the requirements from the PTI have been transferred to this permit.

	Tooling, 440 White, 267 Other, 377 CR/HS, 605 Fire ret., 854 Clear, 522														
	Various work practice standards	3745-21-25(A) through (S)	40 CFR Part 63 WWWW	N	N	Y	N	N	Y	N	Y	N	N		ET: Compliance with emission limitation determined by monitoring and record keeping requirements. All of the requirements from the PTI have been transferred to this permit.
	Dry filtration for PE control	3745-17-11(C)		N	Y	Y	N	N	Y	N	Y	N	N		M/R/Rp sufficient to demonstrate compliance with OR and ET for PE control. M consists of periodic inspections.

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Title V Permit
for
Marble Arch Products Inc.

Facility ID:	1483040411
Permit Number:	P0110479
Permit Type:	Initial
Issued:	8/27/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Marble Arch Products Inc.

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Authorization

Facility ID: 1483040411
Facility Description: Manufacturer of cultured marble, granite and onyx products
Application Number(s): A0044943
Permit Number: P0110479
Permit Description: Initial Title V Operating Permit for an existing reinforced plastic composites production facility that includes the following operations: pouring area of marble castings; facility-wide clean-up material operation; and gel coat spray booth.
Permit Type: Initial
Issue Date: 8/27/2012
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number:

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

Marble Arch Products Inc.
263 Industrial Drive
Franklin, OH 45005

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 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 Southwest Ohio Air Quality 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 Southwest Ohio Air Quality 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.

(1) 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: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; orthe 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 ; ora combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent 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 RequirementsUnder 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.)Records Retention Requirements Under State Law Only

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. The following emissions 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, and R001. 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.

C. Emissions Unit Terms and Conditions

1. P001, Pouring Area Marble Casting

Operations, Property and/or Equipment Description:

Pouring Area Marble Casting

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 Permit to Install (PTI) P0108713	Emissions of volatile organic compounds (VOC) shall not exceed 40.18 pounds per day and 7.33 tons per year (TPY). Particulate emissions (PE) and emissions of particulate matter 10 microns and less in diameter and particulate matter 2.5 microns and less in diameter (PM_{10}/$PM_{2.5}$) shall not exceed 1.40 pounds per hour and 6.13 TPY. See b)(2)a., b)(2)b., b)(2)c., and b)(2)h.
b.	OAC rule 3745-31-05(C), as effective 12/01/06	See b)(2)d.
c.	OAC rules 3745-21-25 (A) through (S)	The affected operations are mixing and VOC-containing materials storage associated with polymer casting. See b)(2)e. and b)(2)g.
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 5935) [In accordance with 40 CFR 63.5790, 40 CFR 63.5795 and Table 4, this emissions unit includes a polymer casting mixing operation and HAP-containing materials storage operation at an existing reinforced plastic composites	See b)(2)f.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	production facility because this emissions unit was installed on 2/1/2000 (new is installed after 8/2/2011) subject to the work practice standards specified in this section.]	
e.	40 CFR Part 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. The maximum styrene content of resins used in this emissions unit shall not exceed 31% by weight.

b. The PE/ PM_{10}/$PM_{2.5}$ emissions from this emissions unit shall be vented to a fabric filter, which exhausts inside the facility, at all times the emissions unit is in operation.

c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

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

Permit to Install (PTI) P0108713 for this emissions unit takes into the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) for VOC and PE/ PM_{10}/$PM_{2.5}$, respectively:

i. The maximum styrene content of resins used in this emissions unit shall not exceed 31% by weight;

ii. Emissions of VOC shall not exceed 7.33 TPY;

iii. The PE/ PM_{10}/$PM_{2.5}$ emissions from this emissions unit shall be vented to a fabric filter, which exhausts inside the facility, at all times the emissions unit is in operation; and

iv. Emissions of PE/ PM_{10}/$PM_{2.5}$ shall not exceed 6.13 TPY.

e. The following requirements apply to the affected operations in this emissions unit pursuant to Table 1 of OAC rule 3745-21-25:

i. Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1.0 inch are permissible around mixer shafts and any required instrumentation;

ii. Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety;

iii. Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels;

iv. Containers of five gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin);

v. For polymer casting mixing operations, containers with a surface area of five hundred square inches or less may be open while active mixing is taking place; and

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

f. The following requirements apply to the affected operations in this emissions unit pursuant to Table 4 of 40 CFR Part 63, Subpart WWWW:

63.5805(a)	mixer covers, mixer vents, and closed covers [requirements are equivalent to Table 1, Work Practice Standards, in OAC rules 3745-21-25 (A) through (S); see b)(2)(e)i. – v. above]
63.5805(a)	HAP-containing materials storage [requirements for HAP-containing materials storage are equivalent to Table 1, Work Practice Standards, in OAC rules 3745-21-25(A) through (S) for VOC-containing materials storage; see b)(2)(e)vi. above]

g. In accordance with paragraph (A)(1) of OAC rule 3745-21-25, this facility is subject to the requirements of OAC rule 3745-21-25. This emissions unit was installed prior to the effective date of the rule and must comply with the requirements of this rule within 12 months from the rule's effective date of December 14, 2010.

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

h. The VOC and PE/ PM_{10}/$PM_{2.5}$ emission limits were established based on the emissions unit's Potential to Emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these emission limits beyond those listed in d) and e).

i. This emissions unit is exempt from the visible emissions limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.

This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emissions unit:

a. The styrene content of each resin, catalyst, coating, etc. employed in percent by weight; and

b. The total HAP/VOC content of each resin, catalyst, coating, etc. employed in percent by weight.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

(2) The permittee shall maintain the following records pursuant to OAC rule 3745-21-25(P):

a. A copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status; and

b. A certified statement that operations are in compliance with the work practice standards specified in Table 1 of OAC rule 3745-21-25, as applicable.

(Authority for Term: OAC rules 3745-21-25(A) through (S) and 3745-77-07(C)(1))

(3) The permittee shall comply with the applicable recordkeeping requirements required under 40 CFR Part 63, Subpart WWWW, including the following sections which are equivalent to the requirements listed in d)(2) above:

63.5915(a)(1) & (a)(2)	retain copies of notifications & records of startups, shutdowns, & malfunctions (SSM)
63.5915(d)	work practice standards compliance certification
63.5920(a) – (d)	recordkeeping format and retention requirements

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

(4) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # P0108713: d)(1), d)(2), and d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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 identify the following:

a. an identification of all exceedances of the maximum styrene content of resins used in this emissions unit of 31% by weight.

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

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

(3) The owner or operator of a facility that has reinforced plastic composites production operations subject to OAC rule 3745-21-25 shall submit semiannual compliance status reports containing the applicable information specified in paragraph (Q)(3) of the rule. The semiannual compliance status reports shall be submitted no later than thirty calendar days after the end of each six-month period. The first compliance report shall cover the period beginning on the compliance date that is specified in paragraph (R) of

the rule and ending on June thirtieth or December thirty-first, whichever date is the first date following the end of the first calendar half after the compliance date that is specified in paragraph (R) of the rule. Each subsequent compliance report shall cover the semiannual reporting period from January first through June thirtieth or the semiannual reporting period from July first through December thirty-first. The owner or operator may submit the first and subsequent semiannual compliance reports according to the dates established in the semiannual reporting requirements of the Standard Terms and Conditions of this Title V permit, instead of according to the dates specified in paragraph (Q)(1) of OAC rule 3745-21-25.

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

a. Company name and address;

b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;

c. Date of the report and beginning and ending dates of the reporting period;

d. If there are no deviations from any work practice standards in Table 1 of this rule, a statement that there were no deviations from work practice standards during the reporting period;

e. For each deviation from a work practice standard that occurs at an affected operation where a CMS is not used to comply with the work practice standard in the rule, the compliance report shall contain the information in paragraphs (Q)(3)(f)(i) and (Q)(3)(f)(ii) of the rule; and

   i. The total operating time of each affected operation during the reporting period; and

   ii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

f. Where multiple compliance options are available, the owner or operator shall state in this compliance report if the owner or operator has changed compliance options since the last compliance report.

The owner or operator shall report all deviations, as described in OAC rule 3745-21-25, in the semiannual monitoring report pursuant to the Standard Terms and Conditions of this Title V permit. If the facility submits a semiannual compliance report pursuant to OAC rule 3745-21-25 along with, or as part of, the semiannual monitoring report required by the Standard Terms and Conditions of this Title V permit, and the semiannual compliance report includes all required information concerning deviations from any VOC emission limitation, operating limit, or work practice standard in OAC rule 3745-21-25, submission of the semiannual compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the

affected source may have to report deviations from permit requirements to the appropriate Ohio EPA district office or local air agency.

(Authority for term: OAC rule 3745-21-25(A) through (S) and 3745-77-07(C)(1))

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

63.5905(a)	initial notification per requirement in 63.9(b)(2)
63.5910(b)	semi-annual compliance report & SSM events

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

(5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # P0108713: d)(1), d)(2), d)(3), and d)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

Emissions of VOC shall not exceed 40.18 pounds per day.

Applicable Compliance Method:

If required, compliance with the daily VOC emission limitation shall be demonstrated by multiplying the actual daily resin(s) usage, in pounds, by the actual resin(s) VOC content(s), in % by weight, and multiplied by the VOC loss emission factor.

The applicable emission limitation was established based on information provided by the permittee in application A0042089 for PTI P0108713 and the emission factor in Table 4.4-2 of AP-42, Fifth Ed., 02/07, for SCC ID 30800766:

4320 pounds of resin/day x 0.31 pound of VOC/pound resin x 0.03 pound VOC lost/pound of VOC = 40.18 pounds of VOC (styrene HAP)/day.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

b. Emission Limitation:

Emissions of VOC shall not exceed 7.33 TPY.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be demonstrated by multiplying the actual annual resin(s) usage, in pounds, by the actual resin(s) VOC content(s), in % by weight, multiplied by the VOC loss emission factor, and divided by 2000 pounds.

The applicable emission limitation was established based on information provided by the permittee in application A0042089 for PTI P0108713 and the emission factor in Table 4.4-2 of AP-42, Fifth Ed., 02/07:

40.18 pound of VOC/day x 365 days/year x 1 Ton/2000 pounds = 7.33 TPY of VOC.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

c. Emission Limitation:

PE/ PM_{10}/$PM_{2.5}$ shall not exceed 1.40 pounds per hour.

Applicable Compliance Method:

If required, compliance with the short-term PE/ PM_{10}/$PM_{2.5}$ emission limitations shall be demonstrated by an emissions test employing Methods 5 and 204 of 40 CFR Part 60, Appendix A. If required, an alternative U.S. EPA approved test method may be used with prior approval from the Ohio EPA.

The applicable emission limitation was established based on information provided by the permittee in application A0042089 for PTI P0108713 and the emission factor in FIRE V6.25 for SCC ID 30101401:

552.7 pounds of resin used/hour x 0.01 pound of PE/ PM_{10}/$PM_{2.5}$/pound of resin used x [(83/100)] x [1 – 90/100)] = 0.46 pound/hour of PE/ PM_{10}/$PM_{2.5}$, controlled.

552.7 pounds of resin used /hour x 0.01 pound of PE/ PM_{10}/$PM_{2.5}$/pound of resin used x [1 – (83/100)] = 0.94 pound/hour of PE/ PM_{10}/$PM_{2.5}$, uncontrolled fugitive.

0.46 pound/hour + 0.94 pound/hour = 1.40 pounds/hour of PE/ PM_{10}/$PM_{2.5}$.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

d. Emission Limitation:

PE/ PM_{10}/$PM_{2.5}$ shall not exceed 6.13 TPY.

Applicable Compliance Method:

Compliance with the annual PE/PM_{10}/$PM_{2.5}$ emission limitations shall be demonstrated by

i. multiplying the actual annual dry materials usage, in pounds, by the FIRE emission factor, multiplied by the actual capture efficiency, (% capture/100), multiplied by the actual control efficiency of the fabric filter, (1 - CE%/100), and divided by 2000 pounds for the controlled PE/ PM_{10}/$PM_{2.5}$ emissions;

ii. multiplying the actual annual dry materials usage, in pounds, by the FIRE emission factor, multiplied by the un-captured emission factor, (1 - % capture/100), and divided by 2000 pounds for the uncontrolled (fugitive) PE/ PM_{10}/$PM_{2.5}$ emissions; and

iii. the summation of i. plus ii. for the total PE/ PM_{10}/$PM_{2.5}$ emissions.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

(2) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # P0108713: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

2. P002, Facility-wide Cleanup Material Usage

Operations, Property and/or Equipment Description:

Facility-wide cleanup material usage for cleaning tools and molds

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 Permit-to-Install (PTI) P0108561	Emissions of organic compounds (OC) shall not exceed 99.15 pounds per day and 9.20 tons per year (TPY). Emissions of volatile organic compounds (VOC) shall not exceed 7.25 pounds per day and 0.02 TPY. See b)(2)a., b)(2)b., and b)(2)g.
b.	OAC rule 3745-31-05(C), as effective 12/01/06	See b)(2)c.
c.	OAC rules 3745-21-25 (A) through (S)	The affected operations are cleanup using organic HAP-containing cleaners to clean cured resin from application equipment that directly contacts resin and HAP-containing materials storage. See b)(2)d. and b)(2)f.
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 5935) [In accordance with 40 CFR 63.5790 and Table 4, this emissions unit includes cleanup using organic HAP-containing cleaners to clean cured resin from application equipment that directly contacts resin and HAP-containing materials storage at an existing reinforced plastic	See b)(2)e.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	composites production facility because this emissions unit was installed on 2/1/2000 (new is installed after 8/2/2011) subject to the work practice standards specified in this section.]	
e.	40 CFR Part 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, these emission limitations/control measures no longer apply.

b. Compliance with OAC rule 3745-31-05(A)(3), as effective 11/30/01, shall be demonstrated by compliance with the following:

i. The maximum OC content of each non-HAP/non-VOC cleanup material employed in this emissions unit shall not exceed 6.61 pounds of OC per gallon, as applied;

ii. The maximum VOC content of each HAP/VOC cleanup material employed in this emissions unit shall not exceed 7.25 pounds of VOC per gallon, as applied;

iii. The maximum amount of non-HAP/non-VOC cleanup material employed in this emissions unit shall not exceed 2785 gallons per year; and

iv. The maximum amount of HAP/VOC cleanup material employed in this emissions unit shall not exceed 5 gallons per year.

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

Permit to Install (PTI) P0108561 for this emissions unit takes into the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) for OC and VOC, respectively:

i. The maximum OC content of each non-HAP/non-VOC cleanup material employed in this emissions unit shall not exceed 6.61 pounds of OC per gallon, as applied;

ii. The maximum amount of non-HAP/non-VOC cleanup material employed in this emissions unit shall not exceed 2785 gallons per year;

iii. Emissions of OC shall not exceed 9.20 TPY;

iv. The maximum VOC content of each HAP/VOC cleanup material employed in this emissions unit shall not exceed 7.25 pounds of VOC per gallon, as applied;

v. The maximum amount of HAP/VOC cleanup material employed in this emissions unit shall not exceed 5 gallons per year; and

vi. Emissions of VOC shall not exceed 0.02 TPY.

d. The following requirements apply to the affected operations in this emissions unit pursuant to Table 1 of OAC rule 3745-21-25:

i. Do not use cleaning solvents (cleaners) that have a VOC content greater than 0.42 pound VOC per gallon, except cleaners used in closed systems and used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin; and

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

e. The following requirements apply to the affected operations in this emissions unit pursuant to Table 4 of 40 CFR Part 63, Subpart WWWW:

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

f. In accordance with paragraph (A)(1) of OAC rule 3745-21-25, this facility is subject to the requirements of OAC rule 3745-21-25. This emissions unit was installed prior to the effective date of the rule and must comply with the requirements of this rule within 12 months from the rule's effective date of December 14, 2010.

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

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for this emissions unit:

a. The company identification of each cleanup material employed;

b. The number of gallons of each cleanup material employed, for each non-HAP/non-VOC cleanup material and for each HAP/VOC cleanup material;

c. The OC content of each cleanup material employed, in pounds OC per gallon of cleanup material, for each non-HAP/non-VOC cleanup material; and

d. The total HAP/VOC content of each cleanup material employed, in pounds VOC per gallon of cleanup material, for each HAP/VOC cleanup material;

e. The total OC emissions from all the non-HAP/non-VOC cleanup materials employed, in pounds [i.e., the summation of the products of d)(1)b. multiplied by d)(1)c. for each non-HAP/non-VOC cleanup material employed]; and

f. The total HAP/VOC emissions from all the HAP/VOC cleanup materials employed, in pounds [i.e., the summation of the products of d)(1)b. multiplied by d)(1).d for each HAP/VOC cleanup material employed].

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

(2) The permittee shall calculate and record the total annual OC and VOC emission rates from cleanup materials, [i.e., the sum of the daily OC and VOC emission rates, each, from cleanup materials for the calendar year in d)(1)].

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

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

a. A copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status; and

b. A certified statement that operations are in compliance with the work practice standards specified in Table 1 of OAC rule 3745-21-25, as applicable.

(Authority for term: OAC rules 3745-21-25(A) through (S) and 3745-77-07(C)(1))

(4) The permittee shall comply with the applicable recordkeeping requirements required under 40 CFR Part 63, Subpart WWWW, including the following sections which are equivalent to the requirements in OAC rule 3745-21-25:

63.5915(a)(1) & (a)(2)	retain copies of notifications & records of startups, shutdowns, & malfunctions (SSM)
63.5915(d)	work practice standards compliance certification
63.5920(a) – (d)	recordkeeping format and retention requirements

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

(5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # P0108561: d)(1), d)(2), d(3) and d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

semiannual reporting period from January first through June thirtieth or the semiannual reporting period from July first through December thirty-first. The owner or operator may submit the first and subsequent semiannual compliance reports according to the dates established in the semiannual reporting requirements of the Standard Terms and Conditions of this Title V permit, instead of according to the dates specified in paragraph (Q)(1) of OAC rule 3745-21-25.

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

a. Company name and address;

b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;

c. Date of the report and beginning and ending dates of the reporting period;

d. If there are no deviations from any work practice standards in table 1 of this rule, a statement that there were no deviations from work practice standards during the reporting period; and

e. For each deviation from a work practice standard that occurs at an affected operation where a CMS is not used to comply with the work practice standard in the rule, the compliance report shall contain the information in paragraphs (Q)(3)(f)(i) and (Q)(3)(f)(ii) of the rule; and

    i. The total operating time of each affected operation during the reporting period; and

    ii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

f. Where multiple compliance options are available, the owner or operator shall state in this compliance report if the owner or operator has changed compliance options since the last compliance report.

The owner or operator shall report all deviations, as described in OAC rule 3745-21-25, in the semiannual monitoring report pursuant to the Standard Terms and Conditions of this Title V permit. If the facility submits a semiannual compliance report pursuant to OAC rule 3745-21-25 along with, or as part of, the semiannual monitoring report required by the Standard Terms and Conditions of this Title V permit, and the semiannual compliance report includes all required information concerning deviations from any VOC emission limitation, operating limit, or work practice standard in OAC rule 3745-21-25, submission of the semiannual compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the appropriate Ohio environmental protection agency district office or local air agency.

(Authority for term: OAC rule 3745-21-25(A) through (S) and 3745-77-07(C)(1))

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

63.5905(a)	initial notification per requirement in 63.9(b)(2)
63.5910(b)	semi-annual compliance report & SSM events

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

(4) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # P0108561: d)(1), d)(2), and d)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

Emissions of OC shall not exceed 99.15 pounds per day.

Applicable Compliance Method:

Compliance with the daily OC emission limitation shall be demonstrated by the recordkeeping in d)(1).

The applicable emission limitation was established based on information provided by the permittee in application A0042089 for PTI P0108561:

15 gallons of acetone/day x 6.61 pounds of OC/gallon acetone = 99.15 pounds of OC/day.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

b. Emission Limitation & Voluntary Restriction:

Emissions of OC shall not exceed 9.20 TPY.

Applicable Compliance Method:

Compliance with the annual OC emission limitation & voluntary restriction shall be demonstrated by the recordkeeping in d)(2).

The applicable emission limitation was established based on information provided by the permittee in application A0042089 for PTI P0108561:

2785 gallons of acetone/year x 6.61 pounds of OC/gallon acetone x 1 Ton/2000 pounds = 9.20 TPY of OC.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

c. Emission Limitation:

Emissions of VOC shall not exceed 7.25 pounds per day.

Applicable Compliance Method:

Compliance with the daily VOC emission limitation shall be demonstrated by the recordkeeping in d)(1).

The applicable emission limitation was established based on information provided by the permittee in application A0042089 for PTI P0108561:

1 gallon of toluene/day x 7.25 pounds of VOC/gallon toluene = 7.25 pounds of VOC/day.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

d. Emission Limitation & Voluntary Restriction:

Emissions of VOC shall not exceed 0.02 TPY.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation & voluntary restriction shall be demonstrated by the recordkeeping in d)(2).

The applicable emission limitation was established based on information provided by the permittee in application A0042089 for PTI P0108561:

5 gallons of toluene/year x 7.25 pounds of VOC/gallon toluene x 1 Ton/2000 pounds = 0.02 TPY VOC/HAP.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

(2) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # P0108561: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

3. R001, Spray Booth

Operations, Property and/or Equipment Description:

Gel Coat Spray Booth

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) Permit-to-Install (PTI) P0108713	The requirements established pursuant to this rule are equivalent to the requirements of 40 CFR Part 63, Subpart WWWW.
b.	OAC rule 3745-17-11(C)	See c)(1) and c)(2).
c.	OAC rules 3745-21-25 (A) through (S)	The affected operations are open molding – gel coat, and mixing and VOC-containing materials storage associated with open molding – gel coat. The emission limits established pursuant to this rule are equivalent to the requirements of 40 CFR Part 63, Subpart WWWW. See b)(2)a. and b)(2)b.
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 5935) [In accordance with 40 CFR 63.5790, 40 CFR 63.5795 and Tables 3 & 4, this emissions unit includes an open molding – gel coat operation, and mixing and HAP-containing materials storage, associated with open molding – gel coat, at an existing reinforced plastic composites production facility because this emissions unit was	See b)(2)c. and b)(2)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	installed on 2/1/2000 (new is installed after 8/2/2011) subject to the emission limitation and work practice standards specified in this section.]	
e.	40 CFR Part 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. The following requirements apply to the affected operations in this emissions unit pursuant to Table 1 of OAC rule 3745-21-25:

i. Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1.0 inch are permissible around mixer shafts and any required instrumentation;

ii. Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety;

iii. Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels;

iv. Containers of five gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin);

v. For polymer casting mixing operations, containers with a surface area of five hundred square inches or less may be open while active mixing is taking place;

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

b. In accordance with paragraph (A)(1) of OAC rule 3745-21-25, this facility is subject to the requirements of OAC rule 3745-21-25. This emissions unit was installed prior to the effective date of the rule and must comply with the requirements of this rule within 12 months from the rule's effective date of December 14, 2010.

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

c. Emissions of organic HAPs from an open molding gel coating operation shall not exceed the following in pounds per ton (lbs/ton) of gel coat applied:

Gel Coat Type	organic HAPs (lbs/ton)
Tooling	440
White/off white pigmented	267
All other pigmented	377
CR/HS or high performance	605
Fire retardant	854
Clear production	522

d. The following requirements apply to the affected operations in this emissions unit pursuant to Table 4 of 40 CFR Part 63, Subpart WWWW:

63.5805(a)	mixer covers, mixer vents, and closed covers [requirements are equivalent to Table 1, Work Practice Standards, in OAC rules 3745-21-25 (A) through (S); see b)(2)(a)i. – v. above]
63.5805(a)	HAP-containing materials storage [requirements for HAP-containing materials storage are equivalent to Table 1, Work Practice Standards, in OAC rules 3745-21-25(A) through (S) for VOC-containing materials storage; see b)(2)(a)vi. above]

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

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

(2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

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

d) Monitoring and/or Recordkeeping Requirements

(1) The owner or operator shall use of the following methods, also as outlined in paragraphs (G)(1) to (G)(4) of OAC rule 3745-21-25, to meet the VOC emission limits for open molding operations specified in Table 2 of this rule. The owner or operator may use any control method that reduces VOC emissions, including reducing resin and gel coat monomer content, changing to non-atomized mechanical application, using covered curing techniques, and routing part or all of the VOC emissions to add-on control. The owner or operator may use different compliance options for the different operations listed in Table 2 of this rule. The necessary calculations shall be completed within thirty days after the end of each month. The owner or operator may switch between the compliance options in paragraphs (G)(1) to (G)(4) of OAC rule 3745-21-25. When the owner or operator changes to an option based on a 12-month rolling average, the owner or operator shall base the average on the previous 12 months of data calculated using the compliance option the owner or operator is changing to, unless the owner or operator was previously using an option that did not require the owner or operator to maintain records of resin and gel coat use. In this case, the owner or operator shall immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

a. Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in b)(2)c., and also as outlined in Table 2 of OAC rule 3745-21-25;

b. Demonstrate that, on average, the individual VOC emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 2 of OAC rule 3745-21-25 that applies to the facility are met;

c. Demonstrate each month that each weighted average of the VOC emissions limits in Table 2 of OAC rule 3745-21-25 that apply are being met; or

d. Meet the VOC emission limit for one application method and use the same resins for all application methods of that resin type. This option is limited to resins of the same type.

(Authority for term: OAC rules 3745-21-25(A) through (S), and 3745-77-07(C)(1))

(2) The permittee shall utilize one or more compliance options, as specified in 40 CFR 63.5810, to demonstrate compliance with the emission standards for open molding in Table 3 of Subpart WWWW, as described in the following sections, and which are equivalent to the requirements listed in d)(1) above:

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

(Authority for term: ORC 3704.03(T), 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-77-07(C)(1))

(3) For meeting any VOC emission limits based on a VOC emission limit specified in Table 2 of OAC rule 3745-21-25, the owner or operator shall collect and keep records of resin and gel coat use, monomer content, and operation where the resin is used. Resin use records may be based on purchase records if the owner or operator can reasonably estimate how the resin is applied.

Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission limit as defined in paragraph (G)(1) of OAC rule 3745-21-25. However, the owner or operator shall retain the records of resin and gel coat monomer content, and the owner or operator shall include the list of these resins and gel coats and identify their application methods in the semiannual compliance reports. If after the owner or operator has initially demonstrated that a specific combination of an individual resin or gel coat, application method, and controls meets an applicable emission limit, and the resin or gel coat changes or the monomer content increases, or the owner or operator changes the application method or controls, then the owner or operator again shall demonstrate that the individual resin or gel coat meets its emission limit as specified in paragraph (G)(1) of OAC rule 3745-21-25. If any of the previously mentioned changes results in a situation where an individual resin or gel coat exceeds its applicable emission limit in table 2 of OAC rule 3745-21-25, the owner or operator shall begin collecting resin and gel coat use records and calculate compliance using one of the averaging options on a twelve-month rolling average.

(Authority for term: OAC rules 3745-21-25(A) through (S), and 3745-77-07(C)(1))

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

a. A copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status;

b. For operations listed in Tables 2, 3, and 4 of OAC rule 3745-21-25, all data, assumptions, and calculations used to determine VOC emission factors; and

c. A certified statement that operations are in compliance with the work practice standards specified in Table 1 of OAC rule 3745-21-25, as applicable.

(Authority for term: OAC rules 3745-21-25(A) through (S), and 3745-77-07(C)(1))

(5) The permittee shall comply with the applicable recordkeeping requirements required under 40 CFR Part 63, Subpart WWWW, including the following sections which are equivalent to the requirements in OAC rule 3745-21-25:

63.5895(c) – (d)	records of resin and gel coat use, organic HAP content, operation and application methods
63.5915(a)(1) & (a)(2)	retain copies of notifications & records of startups, shutdowns, & malfunctions (SSM)
63.5915(c)	organic HAP emissions data
63.5915(d)	work practice standards compliance certification
63.5920(a) – (d)	recordkeeping format and retention requirements

(Authority for term: ORC 3704.03(T), 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-77-07(C)(1))

(6) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(Authority for term: OAC rules 3745-17-11(C)(2)(a) and 3745-77-07(C)(1))

(7) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(Authority for term: OAC rules 3745-17-11(C)(2)(c) and 3745-77-07(C)(1))

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

(Authority for term: OAC rules 3745-17-11(C)(2)(c) and 3745-77-07(C)(1))

(9) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(Authority for term: OAC rules 3745-17-11(C)(2)(d) and (f) and 3745-77-07(C)(1))

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

(Authority for term: OAC rules 3745-17-11(C)(2)(e), (f), and (g) and 3745-77-07(C)(1))

(11) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # P0108713: d)(1), d)(2), d)(3), d)(4), d)(5), d)(6), d)(7), d)(8), d)(9), and d)(10). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

in paragraph (R) of the rule. Each subsequent compliance report shall cover the semiannual reporting period from January first through June thirtieth or the semiannual reporting period from July first through December thirty-first. The owner or operator may submit the first and subsequent semiannual compliance reports according to the dates established in the semiannual reporting requirements of the Standard Terms and Conditions of this Title V permit, instead of according to the dates specified in paragraph (Q)(1) of OAC rule 3745-21-25.

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

a. Company name and address;

b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;

c. Date of the report and beginning and ending dates of the reporting period;

d. If there are no deviations from any VOC emissions limitations and operating limits that apply and there are no deviations from the work practice standards in Table 1 of this rule, a statement that there were no deviations from VOC emissions limitations, operating limits, or work practice standards during the reporting period;

e. For each deviation from a VOC emissions limitation or operating limit and for each deviation of a work practice standard that occurs at an affected operation where a CMS is not used to comply with the work practice standard in the rule, the compliance report shall contain the information in paragraphs (Q)(3)(f)(i) and (Q)(3)(f)(ii) of the rule; and

   i. The total operating time of each affected operation during the reporting period.

   ii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

f. Where multiple compliance options are available, the owner or operator shall state in this compliance report if the owner or operator has changed compliance options since the last compliance report.

The owner or operator shall report all deviations, as described in OAC rule 3745-21-25, in the semiannual monitoring report pursuant to the Standard Terms and Conditions of this Title V permit. If the facility submits a semiannual compliance report pursuant to OAC rule 3745-21-25 along with, or as part of, the semiannual monitoring report required by the Standard Terms and Conditions of this Title V permit, and the semiannual compliance report includes all required information concerning deviations from any VOC emission limitation, operating limit, or work practice standard in OAC rule 3745-21-25, submission of the semiannual compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report.

However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the appropriate Ohio environmental protection agency district office or local air agency.

(Authority for term: OAC rules 3745-21-25(A) through (S), and OAC rule 3745-77-07(C)(1))

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

63.5905(a)	initial notification per requirement in 63.9(b)(2)
63.5910(b)	semi-annual compliance report & SSM events

(Authority for term: ORC 3704.03(T), 40 CFR Part 63, Subpart WWWW, and OAC rule 3745-77-07(C)(1))

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

a. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

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

(Authority for term: OAC rules 3745-15-03(B)(1)(a), 3745-15-05(C), and 3745-77-07(C)(1))

(5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # P0108713: d)(1), d)(2), d)(3), and d)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitations:

Emissions of organic HAPs as listed in b)(2)c.

Applicable Compliance Method:

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

The owner or operator shall use the following equations to calculate the organic HAP and VOC emission factors for specific open molding process streams:

i. For atomized spray gel coat application with nonvapor-suppressed gel coat:

(a) Use this organic HAP emission factor (EF) equation for materials with less than 33% organic HAP (19% organic HAP for nonatomized gel coat); EF = 0.445 x %HAP x 2000.

(b) Use this organic HAP EF equation for materials with 33% or more organic HAP (19% for nonatomized gel coat); EF = [(1.03646 x %HAP) – 0.195] x 2000.

ii. For nonatomized spray gel coat application with nonvapor-suppressed gel coat:

(a) Use this organic HAP emission factor (EF) equation for materials with less than 33% organic HAP (19% organic HAP for nonatomized gel coat); EF = 0.185 x %HAP x 2000.

(b) Use this organic HAP EF equation for materials with 33% or more organic HAP (19% for nonatomized gel coat); EF = [(0.4056 x %HAP) – 0.0505] x 2000.

iii. For atomized spray gel coat application using robotic or automated spray with nonvapor-suppressed gel coat:

(a) Use this organic HAP emission factor (EF) equation for materials with less than 33% organic HAP (19% organic HAP for nonatomized gel coat); EF = 0.445 x %HAP x 2000 x 0.73.

(b) Use this organic HAP EF equation for materials with 33% or more organic HAP (19% for nonatomized gel coat); EF = [(1.03646 x %HAP) – 0.195] x 2000 x 0.73.

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

(Authority for term: ORC 3704.03(T), OAC rules 3745-21-25(A) through (S), 3745-77-07(A)(1), and 40 CFR Part 63, Subpart WWWW)

(2) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # P0108713: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.