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

9/14/2012

Pamela Blakley *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.

Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: SCHMIDT PROGRESSIVE LLC
Facility ID: 1483060076
Permit Type: Initial
Permit Number: P0110073

Dear Ms. Blakley:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.ohio.gov/dapc in Microsoft Word and Adobe Acrobat format. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-3631 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Southwest Ohio Air Quality Agency

50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

614 | 644 3020
614 | 644 3184 (fax)
www.epa.ohio.gov

Ohio | Environmental Protection Agency

PROPOSED

Division of Air Pollution Control
Title V Permit
for
SCHMIDT PROGRESSIVE LLC

Facility ID:	1483060076
Permit Number:	P0110073
Permit Type:	Initial
Issued:	9/14/2012
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
SCHMIDT PROGRESSIVE LLC

Table of Contents

Authorization 1
A. Standard Terms and Conditions 2
1. Federally Enforceable Standard Terms and Conditions 3
2. Monitoring and Related Record Keeping and Reporting Requirements 3
3. Scheduled Maintenance 6
4. Risk Management Plans 6
5. Title IV Provisions 7
6. Severability Clause 7
7. General Requirements 7
8. Fees 8
9. Marketable Permit Programs 8
10. Reasonably Anticipated Operating Scenarios 8
11. Reopening for Cause 9
12. Federal and State Enforceability 9
13. Compliance Requirements 9
14. Permit Shield 11
15. Operational Flexibility 11
16. Emergencies 11
17. Off-Permit Changes 11
18. Compliance Method Requirements 12
19. Insignificant Activities or Emissions Levels 12
20. Permit to Install Requirement 12
21. Air Pollution Nuisance 13
22. Permanent Shutdown of an Emissions Unit 13
23. Title VI Provisions 13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only 14
25. Records Retention Requirements Under State Law Only 14
26. Inspections and Information Requests 14
27. Scheduled Maintenance/Malfunction Reporting 15
28. Permit Transfers 15

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

B. Facility-Wide Terms and Conditions 16

C. Emissions Unit Terms and Conditions 18

1. P010, Resin Tranfer Molding 19

2. P011, Cleanup, Facility-Wide 26

3. Emissions Unit Group -Open Molding: P001, P003, P004, P005, P006 33

Authorization

Facility ID: 1483060076
Facility Description: Reinforced plastics composites production
Application Number(s): A0044074
Permit Number: P0110073
Permit Description: Initial Title V permit, for Schmidt Progressive LLC, which includes one resin transfer molding, three open molding operations, two gel coat application booths, one facility wide material cleanup operation at an existing reinforced plastic composites production facility.
Permit Type: Initial
Issue Date: 9/14/2012
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:

SCHMIDT PROGRESSIVE LLC
360 HARMON AVENUE
Lebanon, OH 45036

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; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air 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.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

15. Operational Flexibility

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

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

16. Emergencies

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

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

17. Off-Permit Changes

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

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

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

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

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

23. Title VI Provisions

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

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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

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

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

25. 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.

26. 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))

27. 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).

28. 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))

29. 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.

C. Emissions Unit Terms and Conditions

1. P010, Resin Tranfer Molding

Operations, Property and/or Equipment Description:

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

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 PTI P0108875	Emissions of volatile organic compounds (VOC) shall not exceed 30.16 pounds per day and 5.50 tons per year (TPY). See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06 PTI P0108875	See b)(2)b.
c.	OAC rules 3745-21-25(A) through (S)	The affected operations are mixing, and VOC-containing materials storage associated with a closed molding, resin transfer molding, operation. See b)(2)c. and b)(2)d.
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 5935) [In accordance with 40 CFR 63.5790, 40 CFR 63.5795 and Table 4, this emissions unit includes mixing, and a HAP-containing materials storage operation associated with a closed molding, resin transfer molding, operation at an existing reinforced plastic composites production facility because this emissions	See b)(2)e. and b)(2)f.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	unit was installed on 6/3/2002 (new is installed after 8/2/2011) subject to the emission limits and work practice standards specified in this section.]	
e.	40 CFR Part 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

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

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

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

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

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

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

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

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

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

d. In accordance with paragraph (A)(1) of OAC rule 3745-21-25, this facility is subject to the requirements of OAC rule 3745-21-25. This emissions unit was installed prior to the effective date of the rule and must comply with the requirements of this rule within 12 months from the rule's effective date of December 14, 2009.

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

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

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

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

f. This emissions unit is subject to 40 CFR Part 63, Subpart WWWW. The complete MACT, including MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

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

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

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

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

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

(2) The permittee shall comply with the applicable recordkeeping requirements required under 40 CFR Part 63, Subpart WWWW as described in the following sections, and which are equivalent to the requirements listed in d)(1) above:

63.5915(a)(1) & (a)(2)	Retain copies of Notifications & records of Startups, Shutdowns, & Malfunctions (SSM)
63.5915(d)	Work practice standards compliance certification
63.5920(a) – (d)	Recordkeeping format and retention requirements

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

(3) 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 # P0108875: d)(1) and d)(2). 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) The owner or operator of a facility that has reinforced plastic composites production operations subject to OAC rule 3745-21-25 shall submit semiannual compliance status reports containing the applicable information specified in paragraph (Q)(3) of the rule. The semiannual compliance status reports shall be submitted no later than thirty calendar days after the end of each six-month period to the Hamilton County Department of Environmental Services. The first compliance report shall cover the period beginning on the compliance date that is specified in paragraph (R) of the rule and ending on June thirtieth or December thirty-first, whichever date is the first date following the end of the first calendar half after the compliance date that is specified in paragraph (R) of the rule. Each subsequent compliance report shall cover the semiannual reporting period from January first through June thirtieth or the semiannual reporting period from July first through December thirty-first.

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

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

a. Company name and address;

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

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

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

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

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

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

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

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

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

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

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

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

(3) 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 # P0108875: e)(1) and e)(2). 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 volatile organic compounds (VOC) shall not exceed 30.16 pounds per day and 5.50 tons per year (TPY).

Applicable Compliance Method:

If required, compliance with the allowable VOC emission limitations shall be demonstrated by multiplying the actual resin usage, in tons per day and/or tons per year, by the applicable VOC EFs as calculated for the specific process streams in f)(1)a., in pounds of VOC per ton, yielding emissions in pounds of VOC per day and/or pounds VOC per year. Pounds of VOC per year shall be converted to TPY by dividing by 2000.

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

2000 pounds resin/day x 0.50 pound of VOC/pound resin x 0.03 pound of VOC lost/pound VOC = 30 pounds of VOC (organic HAP)/day;

2000(0.02) pounds of catalyst/day x 0.004 pound of VOC/pound catalyst = 0.16 pound of VOC/day; and,

30.16 pounds of VOC (organic HAP)/day x 365 days/year x 1 ton/2000 pounds = 5.50 TPY of VOC (organic HAP).

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

b. 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 number P0108875: 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.

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

g) Miscellaneous Requirements

(1) None.

2. P011, Cleanup, Facility-Wide

Operations, Property and/or Equipment Description:

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

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 PTI P0108875	Emissions of volatile organic compounds (VOC) in this emission unit shall not exceed 11.01 pounds per day and 2.01 tons per year (TPY) from the use of VOC/HAP-containing cleaners to clean cured resin from application equipment that directly contacts resin. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06 PTI P0108875	See b)(2)b.
c.	ORC 3704.03(T)	Emissions of organic compounds (OC) in this emission unit shall not exceed 39.66 tons per year (TPY), based on a rolling, 12-month summation, from the use of non-VOC/HAP-containing cleaners in facility-wide cleanup.
d.	OAC rules 3745-21-25(A) through (S)	The affected operations are cleanup using organic VOC-containing cleaners to clean cured resin from application equipment that directly contacts resin and VOC-containing materials storage. See b)(2)c. and b)(2)d.

e.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 5935) [In accordance with 40 CFR 63.5790, 40 CFR 63.5795 and Table 4, this emissions unit includes cleanup using organic HAP-containing cleaners to clean cured resin from application equipment that directly contacts resin and a HAP-containing materials storage operation at an existing reinforced plastic composites production facility because this emissions unit was installed on 6/1/1972 (new is installed after 8/2/2011) subject to the emission limits and work practice standards specified in this section.]	See b)(2)e. and b)(2)f.
f.	40 CFR Part 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

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

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

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

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

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

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

d. In accordance with paragraph (A)(1) of OAC rule 3745-21-25, this facility is subject to the requirements of OAC rule 3745-21-25. This emissions unit was installed prior to the effective date of the rule and must comply with the requirements of this rule within 12 months from the rule's effective date of December 14, 2009.

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

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

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

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

f. This emissions unit is subject to 40 CFR Part 63, Subpart WWWW. The complete MACT, including MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

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

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. The company identification of each cleanup material employed;

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

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

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

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

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

g. The updated rolling, 12-monthemissions of OC, in tons per year, from the use of non-VOC/HAP cleanup materials (the summation of the monthly OC emissions as calculated in d)(2)e. for the current month plus the previous eleven months).

*In the calculations in e. and f., the permittee may take credit for any non-VOC/HAP and/or VOC/HAP cleanup materials recovered.

(Authority for term: OAC rule 3745-31-05(A)(3), ORC 3704.03(T), and OAC rule 3745-77-07(C)(1))

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

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

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

(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 as described in the following sections, and which are equivalent to the requirements listed in d)(1) above:

63.5915(a)(1) & (a)(2)	Retain copies of Notifications & records of Startups, Shutdowns, & Malfunctions (SSM);
63.5915(d)	Work practice standards compliance certification; and
63.5920(a) – (d)	Recordkeeping format and retention requirements.

(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 # P0108875: d)(1) through 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) The owner or operator of a facility that has reinforced plastic composites production operations subject to OAC rule 3745-21-25 shall submit semiannual compliance status reports containing the applicable information specified in paragraph (Q)(3) of the rule. The semiannual compliance status reports shall be submitted no later than thirty calendar days after the end of each six-month period to the Hamilton County Department of Environmental Services. The first compliance report shall cover the period beginning on the compliance date that is specified in paragraph (R) of the rule and ending on June thirtieth or December thirty-first, whichever date is the first date following the end of the first calendar half after the compliance date that is specified in paragraph (R) of the rule. Each subsequent compliance report shall cover the semiannual reporting period from January first through June thirtieth or the semiannual reporting period from July first through December thirty-first.

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

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

a. Company name and address;

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

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

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

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

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

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

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

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

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

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

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

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

(3) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for OC emissions. 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: ORC 3704.03(T) 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 # P0108875: e)(1) - e)(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 Limitations:

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

Applicable Compliance Methods:

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

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

b. Emissions Limitation:

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

Applicable Compliance Method:

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

(Authority for term: ORC 3704.03(T) and OAC rule 3745-77-07(A)(1))

c. 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 number P0108875: 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.

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

g) Miscellaneous Requirements

(1) None.

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

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

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) PTI P0108875	The requirements of this rule are equivalent to the requirements established in 40 CFR Part 63, Subpart WWWW.
b.	OAC rule 3745-17-11(C)	See c)(1) and c)(2).
c.	OAC rules 3745-21-25(A) through (S)	The requirements of this rule are equivalent to the requirements established in 40 CFR Part 63, Subpart WWWW. The affected operations are open molding operations: resin application, filament application, atomized and non-atomized gel coat application; and the mixing, and volatile organic compound (VOC) - containing materials storage associated with open molding. See b)(2)c. and b)(2)d.
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 5935) [In accordance with 40 CFR	See b)(2)a., b)(2)b., and b)(2)e.

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

(2) Additional Terms and Conditions

a. The following requirements are potentially applicable to the affected operations in these emission units as specified in Table 4 of 40 CFR Part 63, Subpart WWWW:

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

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

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

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

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

b. The following organic HAP emission limitations are potentially applicable to these emission units, based on application technique and material properties, as specified in Table 3 of 40 CFR Part 63, Subpart WWWW, and shall not be exceeded based on compliance option selected in d)(2):

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

c. In accordance with paragraph (A)(1) of OAC rule 3745-21-25, this facility is subject to the requirements of OAC rule 3745-21-25. This emissions unit was installed prior to the effective date of the rule and must comply with the requirements of this rule within 12 months from the rule's effective date of December 14, 2009.

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

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

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

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

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

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

e. This emissions unit is subject to 40 CFR Part 63, Subpart WWWW. The complete MACT, including MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

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

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

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system(s) for the control of particulate emissions whenever these emission units are in operation while atomizing gel coat and shall maintain the dry particulate filter(s) in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

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

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

(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 the rule. The owner or operator may use any control method that reduces VOC emissions, including reducing resin and gel coat monomer content, changing to non-atomized mechanical application, using covered curing techniques, and routing part or all of the VOC emissions to add-on control. The owner or operator may use different compliance options for the different operations listed in Table 2 of this rule. The necessary calculations shall be completed within thirty days after the end of each month.

The owner or operator may switch between the compliance options in paragraphs (G)(1) to (G)(4) of OAC rule 3745-21-25. When the owner or operator changes to an option

based on a 12-month rolling average, the owner or operator shall base the average on the previous 12 months of data calculated using the compliance option the owner or operator is changing to, unless the owner or operator was previously using an option that did not require the owner or operator to maintain records of resin and gel coat use. In this case, the owner or operator shall immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

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

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

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

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

(Authority for term: ORC 3704.03(T), OAC rules 3745-21-25(A) through (S), and OAC rule 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:

a. 63.5810(a) Individual resin or gel coat compliance demonstration;

b. 63.5810(b) Average individual limit compliance demonstration for all organic HAP emissions operations and application methods;

c. 63.5810(c) Weighted average emission limit compliance demonstration; and

63.5810(d) Organic HAP emission limitation compliance demonstration for one resin type and application method.

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

Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission limit as defined in paragraph (G)(1) of OAC rule 3745-21-25. However, the owner or operator shall retain

the records of resin and gel coat monomer content, and the owner or operator shall include the list of these resins and gel coats and identify their application methods in the semiannual compliance reports. If after the owner or operator has initially demonstrated that a specific combination of an individual resin or gel coat, application method, and controls meets an applicable emission limit, and the resin or gel coat changes or the monomer content increases, or the owner or operator changes the application method or controls, then the owner or operator again shall demonstrate that the individual resin or gel coat meets its emission limit as specified in paragraph (G)(1) of OAC rule 3745-21-25.

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

(Authority for term: ORC 3704.03(T), OAC rules 3745-21-25(A) through (S), and OAC rule 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: ORC 3704.03(T), OAC rules 3745-21-25(A) through (S), and OAC rule 3745-77-07(C)(1))

(5) The permittee shall comply with the applicable recordkeeping requirements required under 40 CFR Part 63, Subpart WWWW as described in the following sections, and which are equivalent to the requirements listed in d)(3) and d)(4) above:

63.5895(c) – (d) Records of resin and gel coat use, organic HAP content, operation and application methods;

63.5915(a)(1) & (a)(2) Retain copies of Notifications & records of Startups, Shutdowns, & Malfunctions (SSM);

63.6915(c) Organic HAP emissions data;

63.5915(d) Work practice standards compliance certification; and

63.5920(a) – (d) Recordkeeping format and retention requirements.

(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 3745-17-11(C)(2)(a))

(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 rule 3745-17-11(C)(2)(c))

(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 rule 3745-17-11(C)(2)(c))

(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))

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

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

(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 # P0108875: d)(1) through 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) The owner or operator of a facility that has reinforced plastic composites production operations subject to OAC rule 3745-21-25 shall submit semiannual compliance status reports containing the applicable information specified in paragraph (Q)(3) of the rule. The semiannual compliance status reports shall be submitted no later than thirty calendar days after the end of each six-month period to the Hamilton County Department of Environmental Services. The first compliance report shall cover the period beginning on the compliance date that is specified in paragraph (R) of the rule and ending on June thirtieth or December thirty-first, whichever date is the first date following the end of the first calendar half after the compliance date that is specified in paragraph (R) of the rule. Each subsequent compliance report shall cover the semiannual reporting period from January first through June thirtieth or the semiannual reporting period from July first through December thirty-first.

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

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

a. Company name and address;

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

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

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

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

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

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

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

(Authority for term: ORC 3704.03(T), OAC rules 3745-21-25(A) through (S), and OAC rule 3745-77-07(C)(1))

(2) The owner or operator shall report to the Hamilton County Department of Environmental Services if the facility exceeded the one hundred tons of VOC per year emissions threshold if that exceedance would make the facility subject to paragraph (D)(3) of OAC rule 3745-21-25.

(Authority for term: ORC 3704.03(T), OAC rules 3745-21-25(A) through (S), and OAC rule 3745-77-07(C)(1))

(3) Each facility that has obtained a Title V permit pursuant to Chapter 3745-77 of the Administrative Code shall report all deviations, as described in OAC rule 3745-21-25, in the semiannual monitoring report required by the Title V permit. If the facility submits a semiannual compliance report pursuant to this rule along with, or as part of, the semiannual monitoring report required by the facility's Title V permit, and the semiannual compliance report includes all required information concerning deviations from any VOC emissions limitation, operating limit, or work practice standard in this rule, submission of the semiannual compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the Hamilton County Department of Environmental Services.

(Authority for term: ORC 3704.03(T), OAC rules 3745-21-25(A) through (S), and OAC rule 3745-77-07(C)(1))

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

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

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

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

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

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

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

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

(Authority for term: OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C); and OAC rule 3745-77-07(C)(1))

(6) 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 # P0108875: e)(1) through e)(5). 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 HAP shall not exceed 113 pounds per ton of resin for an open molding, corrosion-resistant and/or high strength (CR/HS), mechanical resin application operation

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Applicable Compliance Method:

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

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

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

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

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

From P001:

750 pounds of resin/day x 1Ton/2000 pounds x 88 pounds of VOC (organic HAP)/ton resin = 33 pounds of VOC (organic HAP)/day; and

750(0.02) pounds of catalyst/day x 0.004 pound of VOC/pound catalyst = 0.06 pound of VOC/day.

33 pounds of VOC/day + 0.06 pound of VOC/day = 33.06 pounds of VOC/day.

33 pounds of VOC (organic HAP)/day x 365 days/year x 1 Ton/2000 pounds = 6.02 TPY of VOC (organic HAP).

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

6.02 TPY of VOC + 0.01 TPY of VOC = 6.03 TPY of VOC.

From P003:

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

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

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

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

From P004:

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

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

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

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

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

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

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

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

From P005:

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

From P006:

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

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

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

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

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

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

b. 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 number P0108875: 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.

(Authority for term: OAC rule3745-77-07(A)(3)(a)(ii))

g) Miscellaneous Requirements

(1) None.