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

9/27/2012

Certified Mail

Facility ID: 0204030269
Permit Number: P0109631
County: Ashtabula

Mr. Tony Giancola
Zehrco Giancola Composites Inc. Plant 4
GMR Technology
2131 Aetna Road
Ashtabula, OH 44004

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

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Star Beacon. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page,www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 -*Via E-Mail Notification*
Ohio EPA-NEDO; Pennsylvania

PUBLIC NOTICE
9/27/2012 Issuance of Draft Air Pollution Title V Permit

Zehrco Giancola Composites Inc. Plant 4
4212 ANN AVENUE,
Ashtabula, OH 44004
Ashtabula County
FACILITY DESC.: All Other Plastics Product Manufacturing
PERMIT #: P0109631
PERMIT TYPE: Renewal
PERMIT DESC: Plastic parts manufacturing

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Corey Kurjian, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171

Statement of Basis For Air Pollution Title V Permit

Facility ID:	0204030269
Facility Name:	Zehrco Plastics Inc. (Plant 4)
Facility Description:	Plastic parts manufacturing
Facility Address:	4212 Ann Ave., Ashtabula, OH 44004
Permit #:	P010963, Renewal

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

☐ Lead ☐ Sulfur Dioxide ☐ Carbon Monoxide ☒ Volatile Organic Compounds ☐ Nitrogen Oxides
☐ Particulate Matter ≤ 10 microns ☒ Single Hazardous Air Pollutant ☒ Combined Hazardous Air Pollutants
☐ Maximum Available Control Technology Standard(s)

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.3	N	Y	R003 is subject to MACT subpart PPPP and subpart A.
B.4	N	Y	P007-P010, P901, R001 and R004-R007 are subject to MACT subpart WWWW and subpart A.
B.5	N	Y	List of insignificant emissions units which are not subject to any applicable requirements or meet "de minimus" criteria.
B.7	Y	N	Requirements of OAC rule 3745-21-25

C. Emissions Unit Terms and Conditions

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

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P007, P008, P009, P010	7.3 tons VOC/HAP tons per year	31-05 (A)(3)		N	N	Y	N	N	Y	N	Y	N	N	N	ET – The compliance demonstration is based upon record keeping requirements and calculations.

P007, P008, P009, P010	The permittee shall uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers shall be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials shall be recovered after slitting.	21-25 (D)(1) and Table 1	MACT subpart WWWW Table 4	N	Y	Y	N	N	Y	N	Y	N	N	N	M, R, Rp- Tracking work practice performances for compression press.
P901	OC emissions shall not exceed 1,500 pounds per month and 9.0 tons per year.	31-05 (A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR – Acetone is the only OC which may be used for cleaning of fixtures and equipment qith an acetone rag wipe. ET – The compliance demonstration is based upon record keeping requirements and calculations.

P901	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.	21-25 (D)(1)	N	N	N	N	N	N	N	N	Y	N	N	N	Rp – Deviation reporting for work practices for cold cleaning operations.
P901	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.	N	MACT Subpart WWWW	N	N	Y	N	N	Y	N	Y	N	N	N	M, R, Rp- Tracking work practice performances for cold cleaning operations.
R001, R004, R005, R006	OC emissions shall not exceed 1,200 pounds per month and 7.3 tons per year.	31-05 (A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET – The compliance demonstration is based upon record keeping requirements and calculations.

R001, R004, R005, R006	VOC) emissions shall not exceed emissions standards as specified in Table 2 of OAC rule 3745-21-25.	21-25 (D)(2)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	ET – The compliance demonstration is based upon record keeping requirements and calculations.
R001, R004, R005, R006	Organic hazardous air pollutants (HAP) shall not exceed emissions standards as specified in Table 3 of Subpart WWWW.	N	MACT Subpart WWWW	N	Y	Y	N	N	Y	N	Y	N	N	N	ET – The compliance demonstration is based upon record keeping requirements and calculations.
R003	OC emissions shall not exceed 1,200 pounds per month and 7.3 tons per year.	31-05 (A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET – The compliance demonstration is based upon record keeping requirements and calculations.
R003	PE shall not exceed 0.551 pond per hour.	17-11 (B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Use of dry filters during operation and in accordance with manufacture's recommendations, instruction, and/or operating manuals. ET - If required, compliance with the PE limitation listed above shall be determined in accordance with Test Method 5 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").
R003	Visible PE shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.	17-07 (A)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Compliance shall be demonstrated based upon visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

R003	HAP emissions shall be limited to no more than 0.16 pound organic HAP emitted per pound coating solids used during each 12-month compliance period for each general use coating operation.	N	MACT Subpart PPPP	N	N	Y	N	N	Y	N	Y	N	N	N	ET - The compliance demonstration is based upon record keeping requirements and calculations.
R007	OC emissions shall not exceed 7.3 tons per year.	31-05 (A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - The compliance demonstration is based upon record keeping requirements and calculations.

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Title V Permit
for
Zehrco Giancola Composites Inc. Plant 4

Facility ID:	0204030269
Permit Number:	P0109631
Permit Type:	Renewal
Issued:	9/27/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Zehrco Giancola Composites Inc. Plant 4

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Authorization

Facility ID: 0204030269
Facility Description: Plastic parts manufacturing
Application Number(s): A0043984, A0044598
Permit Number: P0109631
Permit Description: Plastic parts manufacturing
Permit Type: Renewal
Issue Date: 9/27/2012
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0084221

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

Zehrco Giancola Composites Inc. Plant 4
4212 ANN AVENUE
Ashtabula, OH 44004

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

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 Ohio EPA DAPC, Northeast District Office. 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 Ohio EPA DAPC, Northeast District Office.

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

3. Scheduled Maintenance

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

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

4. Risk Management Plans

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

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

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

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

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

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

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

(1) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; orthe permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; ora combination of (1) and (2) above.

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

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

8. Fees

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

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

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

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

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

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

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

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

(2) Compliance certifications shall include the following:

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

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

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

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

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

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

14. Permit Shield

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

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

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

15. Operational Flexibility

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

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

16. Emergencies

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

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

17. Off-Permit Changes

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

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

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that

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

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

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

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

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

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

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

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

23. Title VI Provisions

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

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

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

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

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

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

The permittee shall submit required reports in the following manner:

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

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

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

25. Inspections and Information Requests

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

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

26. Scheduled Maintenance/Malfunction Reporting

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

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

27. Permit Transfers

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

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

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

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

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

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions

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

   a) None.

2. Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

3. The following emissions units, as well as all storage containers and mixing vessels in which coating, thinners and/or other additives, and cleaning materials are stored or mixed, all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials, and all storage container and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations contained in this permit are subject to 40 CFR Part 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

EU ID	Operations, Property and/or Equipment Description
R003	Paint Booth B7

   The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart PPPP. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 2 of 40 CFR Part 63, Subpart PPPP. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart PPPP and Subpart A.

   [Authority for term: 40 CFR §63.4480 - 63.4581, and Table 2 of 40 CFR Part 63, Subpart PPPP]

4. The following emissions units, as well as cleaning of equipment used in reinforced plastic composites manufacture, VOC-containing materials storage, and repair operations on reinforced plastic composites parts that are manufactured at the facility contained in this permit are subject to 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

EU ID	Operations, Property and/or Equipment Description
P007	750 ton compression press for thermoset plastic parts
P008	350 ton compression press for thermoset plastic parts
P009	1200 ton compression press for thermoset plastic parts
P010	2000 ton compression press for thermoset plastic parts
P901	Cold cleaning with acetone of fixtures and equipment
R001	Chop booth 1 - Spray up booth, mixture of polyester resin is combined with glass fibers
R004	Chop booth 2 - Spray up booth, mixture of polyester resin is combined with glass fibers
R005	Chop booth 3 - Spray up booth, mixture of polyester resin is combined with glass fibers

EU ID	Operations, Property and/or Equipment Description
R006	Chop booth 4 - Spray up booth, mixture of polyester resin is combined with glass fibers
R007	Resin transfer molding

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

[Authority for term: 40 CFR §63.5780 – 63.5935 and Table 15 of 40 CFR Part 63, Subpart WWWW]

5. Requirements of OAC rule 3745-21-25:

a) VOC control requirements:

(1) The permittee shall meet the work practice standards in Table 1 of OAC rule 3745-21-25.

(2) Currently, the facility has VOC emissions less than the threshold of one hundred (100) tons per year from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, the permittee shall meet the VOC emissions limits in Table 2 of OAC rule 3745-21-25. The facility's VOC emissions threshold shall be calculated in accordance with OAC rule 3745-21-25(F) and section B.5.e).

(3) If the facility has VOC emissions equal to or greater than the threshold of one hundred (100) tons per year from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, the permittee shall reduce the total VOC emissions from these operations by at least ninety-five percent (95%) by weight. As an alternative to meeting 95% by weight, the permittee may meet the VOC emissions limits in Table 3 of OAC rule 3745-21-25. The facility's VOC emissions threshold shall be calculated in accordance with OAC rule 3745-21-25(F) and section B.5.e).

(4) Once the facility equals or exceeds the one hundred (100) tons of VOC per year threshold of OAC rule 3745-21-25(D)(3), it is always subject to the requirements of the OAC rule 3745-21-25(D)(3).

[Authority for term: OAC rule 3745-21-25(D) and OAC rule 3745-77-07(A)(1)]

b) Recordkeeping Requirements:

(1) In accordance with OAC rule 3745-21-25(P)(1), the permittee shall keep the following records:

a. a copy of each applicability notification and compliance status report submitted to comply with this rule, 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 the rule, as applicable.

[Authority for term: OAC rule 3745-21-25(P) and OAC rule 3745-77-07(A)(3)]

(2) In accordance with OAC rule 3745-21-25(P)(4), all records specified in section B.5.b)(1) above shall be retained by the owner or operator for a period of not less than five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record and shall be made available to the director or any authorized representative of the director for review during normal business hours.

[Authority for term: OAC rule 3745-21-25(P) and OAC rule 3745-77-07(A)(3)]

c) Reporting Requirements:

(1) In accordance with OAC rule 3745-21-25(Q)(3), the permittee shall submit semiannual compliance status reports containing the following information:

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 the OAC rule 3745-21-25, 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 from a work practice standard that occurs at an affected operation where a continuous monitoring system (CMS) is not used to comply with the VOC emissions limitation, operating, or work practice standard in OAC rule 3745-21-25, the compliance report shall contain the information in the following:

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

(a) Open molding;

(b) Compression/injection molding;

(c) Centrifugal casting;

(d) Continuous lamination;

(e) Continuous casting;

(f) Polymer casting;

(g) Pultrusion;

(h) SMC manufacturing;

(i) BMC manufacturing;

(j) Mixing;

(k) Cleaning of equipment used in reinforced plastic composites manufacture;

(l) VOC-containing materials storage; and

(m) Repair operations on reinforced plastic composites parts that are manufactured at the facility.

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

The semiannual compliance status reports shall be submitted no later than thirty calendar days after the end of each 6-month period to the appropriate Ohio EPA district office or local air agency. The first compliance report shall cover the period beginning on the compliance date that is specified in section B.5.d) below and ending on the June thirtieth or December thirty-first, whichever date is the first date following the end of the first calendar half after the compliance date in section B.5.d). 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.

[Authority for term: OAC rule 3745-21-25(Q)(1) and OAC rule 3745-77-07(A)(3)]

(2) In accordance with OAC rule 3745-21-25(Q)(4), the permittee shall report if the facility exceeded the one hundred tons of VOC per year emissions threshold if that exceedance would make the facility subject to OAC rule 3745-21-25(D)(3).

[Authority for term: OAC rule 3745-21-25(Q)(4) and OAC rule 3745-77-07(A)(3)]

(3) In accordance with OAC rule 3745-21-25(S)(2), the permittee of an affected operation, as described in section B.5.c)(1)e.i. above, shall notify the appropriate Ohio EPA district office or local air agency in writing that the affected operation is subject the OAC rule 3745-21-25. The notification, which shall be submitted no later than the effective date of this permit, shall provide the information in section B.5.e)(1) below.

[Authority for term: OAC rule 3745-21-25(S)(2) and OAC rule 3745-77-07(A)(3)]

d) Compliance date of OAC rule 3745-21-25 for this facility is December 14, 2010.

[Authority for term: OAC rule 3745-21-25(R)(1) and OAC rule 3745-77-07(A)(3)]

e) Calculation of facility's VOC emissions threshold

(1) In accordance with OAC rule 3745-21-25(F)(1), to calculate the facility's VOC emissions threshold in tons per year for purposes of determining which requirements apply under OAC rule 3745-21-25(D), the permittee shall use the procedures in section B.5.e)(2) below. A facility's VOC emissions threshold pertains to the following operations: open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing. For facility's VOC emissions threshold, calculate VOC emissions prior to any add-on control device, and do not include VOC emissions from any resin or gel coat used in operations subject to the boat manufacturing NESHAP, 40 CFR Part 63, Subpart VVVV, or from the manufacture of large parts as defined in OAC rule 3745-21-25(D)(4). This facility is an "existing facility".

[Authority for term: OAC rule 3745-21-25(F)(1) and OAC rule 3745-77-07(C)(1)]

(2) In accordance with OAC rule 3745-21-25(F)(3), the permittee may use the procedures in either section B.5.e)(2)a or section B.5.e)(2)b below for the operations specified in section B.5.e)(1) above. If the emission factors for this facility have changed over the period of time prior to its initial compliance date due to incorporation of pollution-prevention control techniques, the facility may base the average emission factor on its operations as they exist on the compliance date. If the facility has accepted an enforceable permit limit that would result in less than one hundred tons per year (per rolling 12-month period) of VOC measured prior to any add-on controls, and can demonstrate that it will operate at that level subsequent to the compliance date, it can be deemed to be below the one hundred tons per year threshold.

a. Use a calculated emission factor

Calculate a weighted average VOC emissions factor on a pounds per ton of resin, monomer, or gel coat basis. Base the weighted average on the prior twelve months of operation. Multiply the weighted average VOC emissions factor by resin, monomer or gel coat use over the same period. The permittee may calculate this VOC emissions factor based on the equations in Table 1 to Subpart WWWW of 40 CFR Part 63, or the permittee may use any VOC emission factor approved by USEPA, such as emission factors or emission factor equations from AP-42, or site-specific VOC emissions factors if they are supported by VOC emissions test data. The organic HAP emission factors in Table 1 to Subpart WWWW of 40 CFR Part 63 are equivalent to the VOC emissions factors for this rule.

b. Conduct performance testing

Conduct performance testing using the test procedures in 40 CFR §63.5850 or paragraph (C) of rule 3745-21-10 of the Administrative Code to determine a site-specific VOC emissions factor in units of pounds of VOC per ton of resin, monomer, or gel coat used. Conduct the test under conditions expected to result in the highest possible VOC emissions. Multiply this factor by annual resin, monomer, or gel coat use to determine annual VOC emissions. This calculation shall be repeated and reported annually.

[Authority for term: OAC rule 3745-21-25(F)(3) and OAC rule 3745-77-07(C)(1)]

(3) In accordance with OAC rule 3745-21-25(F)(4), the facility shall repeat the calculation based upon its resin, monomer, and gel coat use in the 12 months prior to its compliance date, and submit this information with their initial compliance report.

[Authority for term: OAC rule 3745-21-25 (F)(4) and OAC rule 3745-77-07(C)(1)]

(4) In accordance with OAC rule 3745-21-25(F)(5), after the initial compliance date, the facility shall calculate VOC emissions over the 12-month period ending June thirtieth or December thirty-first, whichever date is the first date following the compliance date specified in section B.5.d) above. Subsequent calculations should cover the periods in the semiannual compliance reports.

[Authority for term: OAC rule 3745-21-25(F)(5) and OAC rule 3745-77-07(C)(1)]

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Thermoset Compression Mold Press: P007, P008, P009 and P010

EU ID	Operations, Property and/or Equipment Description
P007	750 ton compression press for thermoset plastic parts
P008	350 ton compression press for thermoset plastic parts
P009	1200 ton compression press for thermoset plastic parts
P010	2000 ton compression press for thermoset plastic parts

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 02-20494, issued on July 12, 2005 for emissions units P007, P008, P009 and P010.	See b)(2)a.
b.	OAC rule 3745-21-07(M)	See b)(2)b.
c.	OAC rule 3745-21-25	The work practice standards specified in Table 1 of this rule are equivalent to the work practice standards established pursuant to 40 CFR Part 63, Subpart WWWW, Table 4. See c)(1).
d.	40 CFR Part 63, Subpart WWWW (40 CFR §63.5780 – 63.5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(1).
e.	40 CFR Part 63.1 through 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

a. Volatile organic compounds/hazardous air pollutant (VOC/HAP) emissions shall not exceed the following:

EU ID	Equipment Description	Tons/yr
P007	750 ton compression press for thermoset plastic parts	7.3
P008	350 ton compression press for thermoset plastic parts	7.3
P009	1200 ton compression press for thermoset plastic parts	7.3
P010	2000 ton compression press for thermoset plastic parts	7.3

[Authority for term: PTI 02-20494, OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

b. Emissions units P007, P008, P009 and P010 are not equipped with control equipment for organic compound emissions. In accordance with OAC rule 3745-21-07(M)(3), these emissions units are not subject to the requirements of OAC rule 3745-21-07(M)(2).

[Authority for term: OAC rule 3745-21-07(M) and OAC rule 3745-77-07(C)(1)]

c) Operational Restrictions

(1) The permittee shall uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers shall be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials shall be recovered after slitting.

[Authority for term: OAC rule 3745-21-25(D)(1), Table 1 of OAC rule 3745-21-25, 40 CFR §63.5805(b), Table 4 of 40 CFR Part 63, Subpart WWWW and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records for each emissions unit:

a. the identification of each mold compound employed in the emissions unit;

b. the weight of each mold compound employed in the emissions unit;

c. the percent of available VOC/HAP, by weight, in each mold compound; and

d. the monthly VOC/HAP emissions, calculated by the following equation, in pounds per day:

$$\mathrm{VOC}\left(\frac{\mathrm{lbs}}{day}\right) = (\mathrm{EF})\sum_{\mathrm{i}}^{\mathrm{n}}[(\mathrm{W})(\mathrm{P})]\mathrm{i}$$

where:

W = the weight of each mold compound employed, as recorded in d)(1)b;

P = the percent of available VOC/HAP, by weight, in each mold compound, as recorded in d)(1)c;

EF = emissions factor, which is 2% of the available HAP as documented in Table 5.2 of the background information document for the MACT, or the most recent factor should that factor be updated;

i = a specific SMC/BMC material employed during the month; and

n = total number of SMC/BMC materials employed during the month.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20494]

(2) The permittee shall conduct daily inspections of each emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in section c)(1) above and shall include the following information:

a. whether the emissions unit was in operation;

b. whether the permittee uncovered, unwrapped, or exposed more than one charge per mold cycle per compression/injection molding machine as specified in c)(1); and

c. information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20494]

e) Reporting Requirements

(1) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart WWWW, including sections §63.5905, §63.5910 and Table 14.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR §63.5905 and 63.5910 and Table 14 of 40 CFR Part 63, Subpart WWWW]

(2) The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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

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:

Volatile organic compounds/hazardous air pollutant (VOC/HAP) emissions shall not exceed the following:

EU ID	Equipment Description	Tons/yr
P007	750 ton compression press for thermoset plastic parts	7.3
P008	350 ton compression press for thermoset plastic parts	7.3
P009	1200 ton compression press for thermoset plastic parts	7.3
P010	2000 ton compression press for thermoset plastic parts	7.3

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in d)(1) summed for the calendar year and then divided by 2000 lbs/ton.

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

g) Miscellaneous Requirements

(1) None.

2. P901, Acetone Cold Clean

Operations, Property and/or Equipment Description:

Acetone rag wipe of product, equipment, fixtures, and work areas throughout the plant.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 02-20157, issued on March 15, 2005	Organic compounds (OC) emissions shall not exceed 1,500 pounds per month and 9.0 tons per year. See c)(1).
b.	OAC rule 3745-21-25(D)(1)	Work practice standards in Table 1 of OAC rule 3745-21-25. See b)(2)a.
c.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935)	Work practice standards in Table 4 of Subpart WWWW. See b)(2)b.
d.	40 CFR Part 63.1 through 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

a. 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.

[Authority for term: OAC rule 3745-21-25(D)(1) and OAC rule 3745-77-07(C)(1)]

b. The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.

[Authority for term: 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935) and OAC rule 3745-77-07(C)(1)]

c) Operational Restrictions

(1) The permittee shall employ only acetone on the rag wipes used to clean product, equipment, fixtures, and work area surfaces. The buckets containing the acetone shall remained covered except when in use. The use of soap and water or any other material not included in the definition of an air pollutant shall be exempt from this requirement.

[Authority for term: PTI 02-20157 and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall make a record of any month during which an OC other than acetone was used on the rag wipes. The record shall include an identification of the OC employed and the number of pounds of said OC employed.

[Authority for term: PTI 02-20157 and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall collect and record the number of gallons of acetone employed each month.

[Authority for term: PTI 02-20157 and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall determine the pounds of acetone emitted each month, calculated as the number of gallons of acetone employed, as recorded in d)(2), times the weight of a gallon of acetone, which is 6.64 pounds minus the pounds of any acetone recovered or recycled.

[Authority for term: PTI 02-20157 and OAC rule 3745-77-07(C)(1)]

(4) The permittee shall determine the tons of acetone emitted each year. This calculation shall be performed by summing the pounds of acetone used each month, as recorded in d)(3), and multiplying by 1 ton/2000 pounds.

[Authority for term: PTI 02-20157 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify any month an OC other than acetone was used for the rag wipes and shall include an identification of the OC employed and the amount, in pounds, of said OC employed.

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: PTI 02-20157 and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit deviation (excursion) reports that include an identification of each month during which the total OC emissions exceeded 1500 pounds, and the actual OC emissions for each such month.

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: PTI 02-20157 and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall also submit annual reports that specify the total OC emissions for the previous calendar year and shall include the actual tons of OC emitted and the allowable tons of OC (9 tons). These reports shall be submitted by January 31 of each year.

[Authority for term: PTI 02-20157 and OAC rule 3745-77-07(C)(1)]

(4) The permittee must submit semiannual compliance reports:

a. if there are no deviations from the work practice standard in b)(2)a, provide a statement that there were no deviations from the work practice standard during the reporting period (i.e., each cleaning solvent used did not 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) for the reporting period);

b. if there are no deviations from the work practice standard in b)(2)b, provide a statement that there were no deviations from the work practice standard during the reporting period (i.e., cleaning solvents used did not contain HAP, except that styrene was used as a cleaner in closed systems, and organic HAP containing cleaners was used to clean cured resin from application equipment, for the reporting period); and

c. if there were deviations with the work practice standards in b)(2)a and b)(2)b, provide the total operating time of the emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

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

f) Testing Requirements

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

a. Emission Limitation:

VOC emissions shall not exceed 1,500lbs/month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3) of these terms and conditions.

b. Emission Limitation:

VOC emissions shall not exceed 9.0 tpy.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the monthly allowable VOC emission limitation (1,500 lbs/month) by the maximum annual months of operation (12 months), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: PTI 02-20157 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group – Chop Booths R001, R004, R005 and R006 (polyester resin is combined with glass fibers)

EU ID	Operations, Property and/or Equipment Description
R001	Chop booth 1 - spray up booth, mixture of polyester resin is combined with glass fibers
R004	Chop booth 2 - spray up booth, mixture of polyester resin is combined with glass fibers
R005	Chop booth 3 - spray up booth, mixture of polyester resin is combined with glass fibers
R006	Chop booth 4 - spray up booth, mixture of polyester resin is combined with glass fibers

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI P0110783, issued on August 22, 2012 for emissions unit R001; PTI P0110788, issued on August 22, 2012 for emissions units R004 and R005; PTI P0110774 issued on August 22, 2012 for emissions unit R006	Organic compounds (OC) emissions shall not exceed 1,200 pounds per month and 7.3 tons per year.
b.	OAC rule 3745-21-25(D)(2)	Volatile organic compounds (VOC) emissions shall not exceed emissions standards as specified in Table 2 of OAC rule 3745-21-25. See b)(2)a.
c.	40 CFR Part 63, Subpart WWWW (40 CFR §63.5780 – 63.5935)	Organic hazardous air pollutants (HAP) shall not exceed emissions standards as specified in Table 3 of Subpart WWWW. See b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR Part 63.1 – 63.15 (40 CFR 63.5925)	Table 15 to Subpart WWWW – Applicability of General Provisions, Subpart A.

(2) Additional Terms and Conditions

a. The permittee shall not exceed the following VOC emission limitations:

OAC rule 3745-21-25(D)(2) For VOC threshold less than 100 tons		Table 2
Type of operation	Resin application method or gel coat type	VOC limit[1]
1. open molding: corrosion-resistant and/or high strength (CR/HS)	a. mechanical resistant application b. filament application c. manual resin application	113 lb/ton. 171 lb/ton. 123 lb/ton.
2. open molding: non-CR/HS	a. mechanical resin application b. filament application c. manual resin application	88 lb/ton. 188 lb/ton. 87 lb/ton.
3. open molding: tooling	a. mechanical resin application b. manual resin application	254 lb/ton. 157 lb/ton.
4. open molding: low-flame spread/low-smoke products	a. mechanical resin application b. filament application c. manual resin application	497 lb/ton. 270 lb/ton. 5 /ton.
5. open molding: shrinkagecontrolled resins[2]	a. mechanical resin application b. filament application c. manual resin application	354 lb/ton. 215 lb/ton. 180 lb/ton.
6. open molding: gel coat[3]	a. tooling gel coat b. white/off white pigmented gel coat c. all other pigmented gel coat d. CR/HS or high performance gel coat e. fire retardant gel coat f. clear production gel coat	440 lb/ton. 267 lb/ton. 377 lb/ton. 605 lb/ton. 854 lb/ton. 522 lb/ton.

[1]VOC emissions limits for open molding and centrifugal casting are expressed as pounds of VOC per ton of resin or gel coat (pounds per ton). The operation shall be at or below these values based on a twelve-month rolling average.

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

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

b. The permittee shall not exceed the following organic HAP emission limitations:

40 CFR 63.5805, Subpart WWWW		Table 3
Type of operation	Resin application method or gel coat type	Organic HAP limit[1]
1. open molding: corrosion-resistant and/or high strength(CR/HS)	a. mechanical resistant application b. filament application c. manual resin application	113 lb/ton. 171 lb/ton. 123 lb/ton.
2. open molding: non-CR/HS	a. mechanical resin application b. filament application c. manual resin application	88 lb/ton. 188 lb/ton. 87 lb/ton.
3. open molding: tooling	a. mechanical resin application b. manual resin application	254 lb/ton. 157 lb/ton.
4. open molding: low-flame spread/low-smoke products	a. mechanical resin application b. filament application c. manual resin application	497 lb/ton. 270 lb/ton. 238 lb/ton.
5. open molding: shrinkage controlled resins[2]	a. mechanical resin application b. filament application c. manual resin application	354 lb/ton. 215 lb/ton. 180 lb/ton.
6. open molding: gel coat[3]	a. tooling gel coat b. white/off white pigmented gel coat c. all other pigmented gel coat d. CR/HS or high performance gel coat e. fire retardant gel coat f. clear production gel coat	440 lb/ton. 267 lb/ton. 377 lb/ton. 605 lb/ton. 854 lb/ton. 522 lb/ton.

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

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

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

63.5810(a)	individual resin or gel coat, as applied, emissions limit
63.5810(b)	on average, the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type
63.5810(c)	weighted average emission limit
63.5810(d)	organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.5810]

(2) The permittee is currently demonstrating compliance through the option specified in 63.5810(a). The permittee shall comply with the following data collection, emission calculation, and record keeping requirements, in addition to those listed in d)(3) below:

a. Calculate your actual organic HAP emissions factor for each different process stream within this emissions unit. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. You must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 of 40 CFR Part 63, Subpart WWWW for open molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in §63.5796. The emission factor calculation should include any and all emission reduction techniques used. If you are using vapor suppressants to reduce HAP emissions, you must determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in Appendix A to Subpart WWWW of 40 CFR Part 63.

Should the permittee choose to demonstrate compliance with the emission limitations listed in b)(2)a by one of the alternative compliance demonstrations specified in d)(1), the permittee shall collect and record the information specified in 40 CFR 63.5810(b),(c), or (d), as appropriate.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.5810]

(3) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart WWWW, including the following sections:

63.5895(c) – (d)	records of resin and gel coat use, organic HAP content and operation where resin is used 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 as defined in § 63.5810(a). However, you must retain the records of resin and gel coat organic HAP content, and you must include the list of these resins and gel coats and identify their application methods in your semiannual compliance reports.
63.5915(a)	copy of compliance notification(s) and report(s)
63.5915(c)	records of all calculations and data used to determine organic HAP emissions factors or average organic HAP contents for operations and application methods as specified under 63.5810
63.5920(a) – (d)	record keeping format and retention requirements

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

(4) The permittee shall utilize one or more compliance options, as specified in OAC rule 3745-21-25(G) to demonstrate compliance with the emission standards for open molding in Table 2 of this rule, as described in the following sections:

OAC rule 3745-21-25(G)(1)	individual resin or gel coat, as applied, emissions limit
OAC rule 3745-21-25(G)(2)	on average, the individual VOC emissions limits for each unique combination of operation type and resin application method or gel coat type
OAC rule 3745-21-25(G)(3)	weighted average VOC emission limit
OAC rule 3745-21-25(G)(4)	VOC emissions limit for one application method and use the same resin(s) for all application methods of that resin type

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25(G)]

(5) The permittee is currently demonstrating compliance through the option specified in OAC rule 3745-21-25(G)(1). The permittee shall comply with the following data collection, emission calculation, and record keeping requirements, in addition to those listed in d)(6) below:

a. Calculate the actual VOC emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus monomer content, the gel coat type, the application technique, or the control technique. The owner or operator shall calculate VOC emissions factors for each different process stream by using the appropriate equations in Table 1 to Subpart WWWW of 40 CFR Part 63 for open molding and for centrifugal casting, or site-specific VOC emissions factors discussed in paragraph (E) of this rule. The emission factor calculation should include any and all emission reduction techniques used including any add-on controls. If vapor suppressants are used to reduce VOC emissions, the owner or operator shall determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in Appendix A to Subpart WWWW of 40 CFR Part 63.

Should the permittee choose to demonstrate compliance with the emission limitations listed in b)(2)b by one of the alternative compliance demonstrations specified in d)(4), the permittee shall collect and record the information specified in OAC rule 3745-21-25(G)(2), (3), or (4), as appropriate.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

(6) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25, including the following sections:

OAC rule 3745-21-25(O)(b)	records of resin and gel coat use, monomer content and operation where resin is used
OAC rule 3745-21-25(O)(c)	resins and gel coats use are not required, when demonstrating compliance with (G)(1) limits, as applied, but include a list of resins and gel coats and identify their application methods in the semiannual compliance reports
OAC rule 3745-21-25(P)(1)(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

OAC rule 3745-21-25(P)(1)(c)	for operations listed in Tables 2, 3, and 4 of OAC rule 3745-21-25 all data, assumptions, and calculations used to determine monomer contents and VOC emissions factors
OAC rule 3745-21-25(P)(4)	record keeping retention requirements

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

(7) The permittee shall maintain monthly records for this emissions unit:

a. the company identification for each resin and gel coat employed;

b. pounds of each resin and gel coat applied;

c. the weight percent of OC (e.g., styrene and methyl methacrylate) for each resin and gel coat applied; and

d. the total OC emission rate for all resins and gel coats applied, as calculated by the following equation, in pounds per month:

$$\text{OC (lbs/month)} = \sum_{i}^{n} \text{HAPi x EF}$$

where:

HAPi = pounds of available HAP in each resin, i, applied;

n = number of resins applied; and

EF = emissions factor(s) from Table 1 of Subpart WWWW of 40 CFR 63.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110774, P0110783 and P0110788]

e) Reporting Requirements

(1) The permittee shall submit semi-annual reports and such other notifications and reports to the Director (the Ohio EPA eBusiness Center, Air Services) as are required in 40 CFR Part 63, Subpart WWWW, pursuant to the following sections:

63.5905(b)	15-day notification of change(s)
63.5910(a) – (b) and Table 14	semi-annual compliance reports
63.5910(c) – (i) and Table 14	content of semi-annual compliance reports
63.5895(d)	list individual resins and gelcoats and application methods in semi-annual compliance reports

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

(2) The permittee shall submit semi-annual reports and such other notifications and reports to the Director (the Ohio EPA eBusiness Center, Air Services) as are required in OAC rule 3745-21-25, pursuant to the following sections:

OAC rule 3745-21-25(Q)(3)(f)	semi-annual compliance reports
OAC rule 3745-21-25(Q)(3)(h)	state change in compliance option, since last compliance report
OAC rule 3745-21-25(O)(2)(c)	list individual resins and gelcoats and application methods in semi-annual compliance reports

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

(3) The permittee shall submit quarterly deviation (excursion) reports for each emissions unit which include the following information:

a. an identification of each month when the OC emissions exceeded 1,200 pounds per month, and the actual OC emissions for each such month.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110774, P0110783 and P0110788]

(4) The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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

f) Testing Requirements

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

a. Emission Limitation:

40 CFR 63.5805, Subpart WWWW, Table 3
Organic HAP emission limitations in b)(2)a.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in d)(1) – d)(3) of these terms and conditions.

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

b. Emission Limitation:

OAC rule 3745-21-25(D)(2), Table 2
VOC emission limitations in b)(2)b.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in d)(4) – d)(6) of these terms and conditions.

[Authority for term: OAC rules 3745-77-07(C)(1) and OAC rule 3745-21-25]

c. Emission Limitation:

OC emissions shall not exceed 1,200 pounds per month and 7.3 tons per year.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in d)(7) of these terms and conditions.

The tpy emission limitation was developed by multiplying the monthly OC emission limitation (1,200 lbs/month) by 12 months per year, and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110774, P0110783 and P0110788]

g) Miscellaneous Requirements

(1) None.

4. R003, Paint Booth B7

Operations, Property and/or Equipment Description:

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI P0110792 issued on August 22, 2012)	Organic compounds (OC) emissions shall not exceed 1,200 pounds per month and 7.3 tons per year.
b.	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) shall not exceed 0.551 pound per hour.
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
d.	40 CFR Part 63, Subpart PPPP	In accordance with 40 CFR 63.4490(b)(1), organic Hazardous Air Pollutant (HAP) emissions shall be limited to no more than 0.16 pound organic HAP emitted per pound coating solids used during each 12-month compliance period for each general use coating operation. See b)(2)a and b)(2)b.
e.	40 CFR §63.1 - 63.15	The General Provisions that apply are specified in Table 2 of 40 CFR Part 63, Subpart PPPP.

(2) Additional Terms and Conditions

a. The permittee must include all coating (as defined in 40 CFR §63.4581), thinners and/or other additives, and cleaning materials used in this emissions unit when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in section b)(1)d above. To make this determination, the permittee must use at least one of the following compliance operations. The permittee may apply any of the compliance options to an individual coating

operation, or to multiple coating operations as a group, or to the entire affected source. The permittee may use different compliance options for different coating operations or at different times on the same coating operation. The permittee may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, the permittee may not use different compliance options at the same time on the the same coating operations. If the permittee switches between compliance options for any coating operation or group of coating operations, the permittee must document this switch as required by 40 CFR §63.4530 (c), the permittee must report it in the next semiannual compliance report required in section 40 CFR §63.4520.

i. Compliant material option:

Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in section b)(1)d above, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee must meet all the requirements of 40 CFR §63.4540, §63.4541, and §63.4542 to demonstrate compliance with the applicable emission limit using this option.

ii. Emission rate without add-on controls options.

Demonstrate that, based on the coatings, thinners and/or , other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emissions limit in section b)(1)d above, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee must meet all the requirements of 40 CFR §63.4550, 63.4551, and 63.4552 to demonstrate compliance with the emission limit using this option.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR §63.4491(a) – (b) and PTI P0110792]

b. The permittee must be in compliance with the emission limitations in b)(1)d at all times.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR §63.4500(a)(1) and PTI P0110792]

c) Operational Restrictions

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

[Authority for term: OAC rule 3745-17-11(C)(1), OAC rule 3745-17-11(C)(2)(b), OAC rule 3745-77-07(A)(1) and PTI P0110792]

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

[Authority for term: OAC rule 3745-17-11(C)(2)(e), OAC rule 3745-77-07(A)(1) and PTI P0110792]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records for this emissions unit:

a. the company identification for each coating employed;

b. the number of gallons of each coating employed;

c. the OC content of each coating, in pounds per gallon; and

d. the total OC emission rate for all coatings employed, as calculated by the following equation, in pounds per month:

$$\mathrm{OC}\left(\frac{\mathrm{lbs}}{\mathrm{month}}\right) = \mathrm{y\ x\ EF}$$

where:

y = monthly gallons of coatings employed; and

EF = lb of OC/ gallon.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110792]

(2) 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), OAC rule 3745-77-07(C)(1) and PTI P0110792]

(3) 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), OAC rule 3745-77-07(C)(1) and PTI P0110792]

(4) 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), OAC rule 3745-77-07(C)(1) and PTI P0110792]

(5) 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 rule 3745-17-11(C)(2)(d) and (f), OAC rule 3745-77-07(C)(1) and PTI P0110792]

(6) 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 rule 3745-17-11(C)(2)(e),(f), and (g)], for [OAC rule 3745-17-11(C)(1), and OAC rule 3745-77-07(C)(1) and PTI P0110792]

(7) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be

noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the weekly check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A) and PTI P0110792]

(8) The permittee shall collect and record the information, as required by the following rules, each month for this emissions unit:

a. 40 CFR Part 63, subpart PPPP, including section §63.4530; and

b. 40 CFR Part 63, subpart PPPP, including section §63.4531.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR §63.4530 and 63.4531]

e) Reporting Requirements

(1) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart PPPP, including sections §63.4510 and §63.4520.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR §63.4510 and 63.4520 and PTI P0110792]

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

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

b. any monthly record showing that OC emissions from this emissions unit exceeded the limit in b)(1)a and the actual OC emissions from each such month; and

c. any monthly record showing that HAP emissions from this emissions unit exceeded the limit in b)(1)d and the actual HAP emissions from each such month.

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-77-07(C)(1) and PTI P0110792]

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. <u>Emission Limitation:</u>

OC emissions shall not exceed 1,200 pounds per month and 7.3 tons per year.

<u>Applicable Compliance Method:</u>

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) of these terms and conditions.

b. <u>Emissions Limitation:</u>

PE from this emissions unit shall not exceed 0.551 lb/hr (using Table I).

<u>Applicable Compliance Method:</u>

If required, compliance with the PE limitation listed above shall be determined in accordance with Test Method 5 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

c. <u>Emission Limitation:</u>

Visible PE shall not exeed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

d. Emission Limitation:

Organic HAP emissions shall be limited to no more than 0.16 pound organic HAP emitted per pound coating solids used during each 12-month compliance period for each general use coating operation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in section d)(8) above.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI No. P0110792]

g) Miscellaneous Requirements

(1) None.

5. R007, Resin Transfer Molding

Operations, Property and/or Equipment Description:

Vacuum Molding

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 02-20157 issued on March 15, 2005	Organic compounds (OC) emissions shall not exceed 7.3 tons per year.
b.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	No organic hazardous air pollutants (HAP) emissions standards.
c.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	No work practice standards for this type of closed molding.
d.	40 CFR Part 63.1-63.15 (40 CFR 63.5925)	Table 15 to Subpart WWWW - Applicability of General Provisions, Subpart A.
e.	OAC rule 3745-21-25	Excluded from any requirements in this rule, OAC rule 3745-21-25(C)(2)(k).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records for this emissions unit:

a. the company identification for each resin applied;

b. pounds of each resin applied;

c. the weight percent of OC (e.g., styrene and methyl methacrylate) for each resin applied; and

d. the total OC emission rate for all resins applied, as calculated by the following equation, in pounds per month:

$$\text{OC (lbs/month)} = \sum_{i}^{n} \text{HAPi x EF}$$

where:

HAPi = pounds of available HAP in each resin, i, applied;
n = number of resins applied; and
EF = each site specific emissions factor (2%).

The emission factor (2% of available HAP) is taken from Table 5-2 from "Baseline Emissions Estimates and Methodologies".

e. the annual OC emissions shall be calculated by summing the monthly emissions.

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

e) Reporting Requirements

(1) The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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

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. <u>Emission Limitation:</u>

OC emissions shall not exceed 7.3 tons per year.

<u>Applicable Compliance Method:</u>

Compliance shall be determined based upon the record keeping requirements specified in d)(1).

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

g) Miscellaneous Requirements

(1) None.