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

10/2/2012

Certified Mail

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

DENNIS DELAAT
RMC USA INC.
149 S. Cucumber St.
P.O. Box 127
Jefferson, OH 44047

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0204000423
Permit Number: P0110961
Permit Type: Administrative Modification
County: Ashtabula

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully.Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northeast District Office. 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.

Sincerely,

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

Cc: U.S. EPA
Ohio EPA-NEDO; Pennsylvania; Canada

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install
for
RMC USA INC.

Facility ID:	0204000423
Permit Number:	P0110961
Permit Type:	Administrative Modification
Issued:	10/2/2012
Effective:	10/2/2012

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
RMC USA INC.

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. Federally Enforceable Standard Terms and Conditions 4
2. Severability Clause 4
3. General Requirements 4
4. Monitoring and Related Record Keeping and Reporting Requirements 5
5. Scheduled Maintenance/Malfunction Reporting 6
6. Compliance Requirements 6
7. Best Available Technology 7
8. Air Pollution Nuisance 7
9. Reporting Requirements 7
10. Applicability 8
11. Construction of New Sources(s) and Authorization to Install 8
12. Permit-To-Operate Application 9
13. Construction Compliance Certification 9
14. Public Disclosure 9
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 10
16. Fees 10
17. Permit Transfers 10
18. Risk Management Plans 10
19. Title IV Provisions 10
B. Facility-Wide Terms and Conditions 11
C. Emissions Unit Terms and Conditions 13
1. Emissions Unit Group – Chop Booths R001, R002, R003, R004, R005, R006, and R007 (Chop/Gelcoat booths) 14
2. R008, Paint Booth/Resin Spray Up 23
3. R009, Paint Booth 35

Authorization

Facility ID: 0204000423
Facility Description: Plastics Manufacturer
Application Number(s): M0001906
Permit Number: P0110961
Permit Description: Administrative modification to address the recission of OAC rule 3745-21-07(G)(2).
Permit Type: Administrative Modification
Permit Fee: $0.00
Issue Date: 10/2/2012
Effective Date: 10/2/2012

This document constitutes issuance to:

RMC USA INC.
149 S. Cucumber St.
P.O. Box 127
Jefferson, OH 44047

of a Permit-to-Install for the emissions unit(s) identified on the following page.

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

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

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0110961
Permit Description: Administrative modification to address the recission of OAC rule 3745-21-07(G)(2).

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

Emissions Unit ID:	**R001**
Company Equipment ID:	Chop/Gelcoat Booth
Superseded Permit Number:	02-1349
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R002**
Company Equipment ID:	Gelcoat/Chop Booth
Superseded Permit Number:	02-1349
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R003**
Company Equipment ID:	Chop/Gelcoat Booth
Superseded Permit Number:	02-1349
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R004**
Company Equipment ID:	Gelcoat/Chop Booth
Superseded Permit Number:	02-1349
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R005**
Company Equipment ID:	Chop/Gelcoat Booth
Superseded Permit Number:	02-1349
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R006**
Company Equipment ID:	Gelcoat/Chop Booth
Superseded Permit Number:	02-1349
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R007**
Company Equipment ID:	Tooling Gelcoat Booth
Superseded Permit Number:	02-1349
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R008**
Company Equipment ID:	Paint Booth/Resin Spray Up
Superseded Permit Number:	02-1349
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R009**
Company Equipment ID:	Paint Booth
Superseded Permit Number:	02-1349
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

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

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

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

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

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

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

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

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

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

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

2. Severability Clause

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

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

3. General Requirements

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

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

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

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

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

4. Monitoring and Related Record Keeping and Reporting Requirements

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

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

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

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

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

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

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

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

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

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

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

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

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

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

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

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have

been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as “permanently shut down” in Ohio EPA’s “Air Services” along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the “Owner/Contact Change” functionality in Air Services once the transfer is legally completed.The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

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

   a) None.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group – Chop Booths R001, R002, R003, R004, R005, R006, and R007 (Chop/Gelcoat booths)

Operations, Property and/or Equipment Description:

EU ID	Operations, Property and/or Equipment Description
R001	Chop/Gelcoat booth
R002	Chop/Gelcoat booth
R003	Chop/Gelcoat booth
R004	Chop/Gelcoat booth
R005	Chop/Gelcoat booth
R006	Chop/Gelcoat booth
R007	Chop/Gelcoat booth

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	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.
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. 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]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: 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]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

(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)b 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.

(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

(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

(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):

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)a 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.

(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

(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 Part 63.

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

(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

(3) The permittee shall submit quarterly deviation (excursion) reports for each emissions unit that 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.

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.

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>

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

<u>Applicable Compliance Method:</u>

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1), d)(2) and d)(3) of these terms and conditions.

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

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

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(4), d)(5) and d)(6) of these terms and conditions.

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 demonstrated 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.

g) Miscellaneous Requirements

(1) None.

2. R008, Paint Booth/Resin Spray Up

Operations, Property and/or Equipment Description:

Paint Booth/Resin Spray Up

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)	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.
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 3745-17-11(C)	See c)(1) and c)(2).
f.	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)c and b)(2)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	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 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. 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]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 filament application 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	chanical 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. 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 b)(2)b. To make this determination, the permittee must use at least one of the following compliance options. 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 b)(2)b, 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 b)(1)d, 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.

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

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.

(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.

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

(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):

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)b 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.

(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

(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

(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):

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)a 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.

(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

(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 Part 63.

(8) 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:

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

where:

y = monthly gallons of coatings employed; and

EF = lb of OC/ gallon.

(9) 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.

(10) 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.

(11) 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.

(12) 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.

(13) 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.

(14) 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.

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

(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

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

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. 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.

(4) 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.

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

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

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

b. any monthly record showing that HAP emissions from this emissions unit exceeded the limit in section b)(1)f 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.

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>

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

<u>Applicable Compliance Method:</u>

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1), d)(2) and d)(3) of these terms and conditions.

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

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

<u>Applicable Compliance Method:</u>

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(4), d)(5) and d)(6) of these terms and conditions.

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 demonstrated based upon the record keeping requirements specified in d)(7) and d)(8) 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.

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 demonstrated based upon the record keeping requirements specified in d)(14) of these terms and conditions.

g) Miscellaneous Requirements

(1) None.

3. R009, Paint Booth

Operations, Property and/or Equipment Description:

Paint Booth

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compounds (OC) emissions shall not exceed 1,200 pounds per month and 7.3 tons per year.
b.	OAC rule 3745-17-11(C)	See c)(1) and c)(2).
c.	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)b and b)(2)c.
d.	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 b)(1)c. To make this determination, the permittee must use at least one of the following compliance options. 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 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 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 b)(1)c, 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 b)(1)c, 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.

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

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.

(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.

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:

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

where:

y = monthly gallons of coatings employed; and

EF = lb of OC/ gallon.

(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.

(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.

(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.

(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.

(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.

(7) 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.

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.

(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 daily record showing that OC emissions from this emissions unit exceeded the limit in section b)(1)a and the actual OC emissions from each such hour; and

c. any monthly record showing that HAP emissions from this emissions unit exceeded the limit in section b)(1)c 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.

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:

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

Applicable Compliance Method:

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

b. 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 demonstrated based upon the record keeping requirements specified in d)(7) of these terms and conditions.

g) Miscellaneous Requirements

(1) None.