John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

1/29/2013

Certified Mail

Mr. Pat Davin
CW Ohio INC.
C W Ohio Inc,
1209 Maple Ave.
Conneaut, OH 44030-2120

Facility ID: 0204020069
Permit Number: P0084204
County: Ashtabula

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

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA)Preliminary Proposed Title V permit that was issued in draft form on 8/3/2012. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

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

and

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

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA DAPC, Northeast District Office

Response to Comments

Facility ID:	0204020069
Facility Name:	CW Ohio INC.
Facility Description:	Manufacturer of wood and fiberglass building products
Facility Address:	1209 Maple Ave. Conneaut, OH 44030-2120 Ashtabula County
Permit:	P0084204, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Star Beacon on 08/17/2012. The comment period ended on 09/16/2012.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

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

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

1. Topic: None

a. Comment: Storage tanks (T001 and T002), insignificant emissions units, should be added to the list in section B.2.

b. Response: We agree. We added those emissions units to the permit.

c. Comment: The emissions unit ID P038 should be added to the header page for the group of mixers.

d. Response: We agree. P038 was added to the header page.

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
CW Ohio INC.

Facility ID:	0204020069
Permit Number:	P0084204
Permit Type:	Renewal
Issued:	1/29/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
CW Ohio INC.

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Authorization

Facility ID:	0204020069
Facility Description:	Manufacturer of wood and fiberglass building products
Application Number(s):	A0014736, A0014737, A0037295, A0041208
Permit Number:	P0084204
Permit Description:	Title V renewal permit for a manufacturer of wood and fiberglass building products. Operations include mixing, centrifugal casting, open molding, pultrusion, coating and woodworking.
Permit Type:	Renewal
Issue Date:	1/29/2013
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0084203

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

CW Ohio INC.
1209 Maple Ave.
Conneaut, OH 44030-2120

Ohio Environmental Protection Agency (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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

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

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

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

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

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

8. Fees

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

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

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

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

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

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

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official

that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

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

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

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

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

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

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

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

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

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

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

(2) Compliance certifications shall include the following:

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

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

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

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

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

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

14. Permit Shield

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

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

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

15. Operational Flexibility

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

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

16. Emergencies

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

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

17. Off-Permit Changes

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

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

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

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

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

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

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

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

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

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

23. Title VI Provisions

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

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

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

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

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

24. Reporting Requirements Related to Monitoring and Record Keeping 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.)

25. Records Retention RequirementsUnder State Law Only

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

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of

a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

27. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

a) None.

2. The following insignificant emissions units are located at this facility:

L002 – L004	Parts Cleaners
T001	10,000-gallon resin storage tank
T002	10,000-gallon resin storage tank

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed below that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, 40 CFR Part 60 or 63.

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3. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart WWWW: P003 – P020, P022 – P038, P040 – P044, and T001 – T002. 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 or local air agency.

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

4. 40 CFR, Part 63, Subpart WWWW – Operational Restriction for the facility-wide work practice standard:

a) For all fiberglass reinforced plastic operations, the permittee must keep all containers that store HAP-containing materials closed or covered, except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

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

5. 40 CFR, Part 63, Subpart WWWW – Monitoring and/or Recordkeeping Requirements for facility-wide work practice standard:

a) The permittee shall perform daily inspections when in operation of all containers that store HAP-containing materials, and record the following information:

(1) the date and reason why any required inspection was not performed;

(2) the date and all times when containers that store HAP-containing materials were not closed or covered, except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety; and

(3) information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW and PTI P0107595]

6. 40 CFR, Part 63, Subpart WWWW – Reporting Requirements for facility-wide work practice standard:

a) The permittee must submit the following semiannual compliance reports:

(1) if there are no deviations from this work practice standard in B.4.a), provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., all containers that store HAP-containing materials were closed or covered during the reporting period); and

(2) if there were deviations with this work practice standard in B.4.a), provide the total operating time of each 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 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW]

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

63.5915(a)	copy of compliance notification(s) and report(s)
63.5915(d)	certified statement of compliance with work practice requirements
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]

8. The following emissions units contained in this permit are subject to OAC rule 3745-21-25: P003 – P020, P022 – P038, P040 – P044, and T001 – T002.

[Authority for term: OAC rule 3745-21-25]

9. OAC rule 3745-21-25 – Operational Restriction for the facility-wide work practice standard:

a) For all fiberglass reinforced plastic operations, the permittee must keep all containers that store VOC-containing materials closed or covered except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety.

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

10. OAC rule 3745-21-25 – Monitoring and/or Recordkeeping Requirements for facility-wide work practice standard:

a) The permittee shall perform daily inspections when in operation of all containers that store VOC-containing materials, and record the following information:

(1) the date and reason why any required inspection was not performed;

(2) the date and all times when containers that store VOC-containing materials were not closed or covered, except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety; and

(3) information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25 and PTI P0107595]

11. OAC rule 3745-21-25 – Reporting Requirements for facility-wide work practice standard:

a) The permittee must submit the following semiannual compliance reports:

(1) if there are no deviations from the work practice standard in B.9.a), provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., all containers that store VOC-containing materials were closed or covered during the reporting period); and

(2) if there were deviations with the work practice standard in B.9.a), provide the total operating time of each 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 3745-77-07(C)(1) and OAC rule 3745-21-25]

12. OAC rule 3745-21-25 – Combination of facility-wide uncontrolled VOC emissions:

The permittee has reported in their initial notification for this rule that VOC emissions were less than the threshold of one hundred tons of VOC per year prior to any add-on control device from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing.

[Authority for term: OAC rule 3745-21-25]

13. OAC rule 3745-21-25 –Monitoring Requirements for facility-wide uncontrolled VOC emissions:

a) The permittee shall calculate, on a semiannual basis, a 12-month summation of tons of VOC emissions, prior to any add-on control device, from the following operations: open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and

BMC manufacturing. The permittee shall calculate the facility's VOC emissions threshold using procedures in OAC rule 3745-21-25(F)(3).

The calculated VOC emissions shall cover the 12-month period prior to June 30 and the 12-month period prior to December 31.

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

14. OAC rule 3745-21-25 –Reporting Requirements for facility-wide uncontrolled VOC emissions threshold:

a) The permittee shall report if the facility met or exceeded the one hundred tons of VOC per year actual emissions threshold (VOC emissions prior to any add-on control device) as calculated in B.13.a) and if the amount of VOC emissions would make the facility subject to paragraph (D)(3) of OAC rule 3745-21-25. The report shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by whichever date comes first after the facility's determination that it met or exceeded the VOC threshold: July 31 or January 31.

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

15. OAC rule 3745-21-25 –Compliance date for facility-wide uncontrolled VOC emissions over the threshold of 100 tons per year:

a) If the facility has actual uncontrolled VOC emissions less than the threshold of one hundred tons of VOC per year from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, and the facility subsequently increases its actual uncontrolled VOC emissions to meet or exceed the threshold of one hundred tons of VOC per year from the combination of such operations, the compliance date of any affected operation pertaining to a new VOC emission requirement is two years from the date that the semiannual compliance report indicates the facility meets or exceeds the threshold of one hundred tons of VOC per year.

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

16. 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(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)(e)	a certified statement that operations are in compliance with the work practice standards specified in Table 1 of OAC rule 3745-21-25, as applicable.
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]

17. The following emissions units contained in this permit are subject to 40 CFR Part 63, SubpartQQQQ: R002 – R004. 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 or local air agency.

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

C. Emissions Unit Terms and Conditions

1. P017, Cap & Base molding

Operations, Property and/or Equipment Description:

Cap & Base 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.	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 40 CFR 63.5805, Subpart WWWW. See b)(2)a, Table 3 of Subpart WWWW.
b.	40 CFR Part 63.1 – 63.16 (40 CFR 63.5925)	Table 15 to Subpart WWWW – Applicability of General Provisions, Subpart A.
c.	OAC rule 3745-31-05(A)(3) (PTI 02-23000)	Organic compound (OC) emissions shall not exceed 134 lbs/month and 0.80 ton/year. Particulate emissions (PE) shall not exceed 0.87 lb/hr and 3.8 tons/year. Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average.
d.	OAC rule 3745-17-07(A)(1)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-21-25(D)	Volatile organic compound (VOC) emissions shall not exceed emissions standards as specified in OAC rule 3745-21-25(D)(2). See b)(2)b, Table 2 of OAC rule 3745-21-25.

(2) Additional Terms and Conditions

a. 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. 4 /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.

b. 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: 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.

c. The particulate emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

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 the following 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 available OC monomer (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:

$$\text{OC (lbs/month)} = \sum_{i}^{n} [(W)(P)]\ i \text{ x EF}$$

where:

W = the weight of each resin applied, as recorded in d)(7)b;
P = the percent of available OC monomer, by weight, of each resin applied, as recorded in d)(7)c;
i = pounds of available OC monomer in each resin, i, applied;
n = number of resins applied; and
EF = each emissions factor.

A site specific emissions factor was developed by CW Ohio on May 19 and 20, 2008. The site-specific emission factor was established at 0.0045 lb of HAP emissions emitted / lb of available HAP monomer (styrene), (9 lbs of HAP emissions emitted / tons of available HAP monomer (styrene)), which is equivalent to 0.0045 lb of OC emissions emitted / lb of available OC monomer, (9 lbs of OC emissions emitted / tons of available OC monomer)

Note: Available OC monomers include all available OC monomers and available organic HAP monomers in each resin as applied (e.g., styrene, vinyl toluene, methyl methacrylate, and etc.). The product [(W)(P)] is the amount of available OC monomers, in pounds, of each resin applied.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-23000]

(8) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.5 to 10 inches of water.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate

emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

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

e) Reporting Requirements

(1) The permittee shall submit semiannual 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	semiannual compliance reports
63.5910(c) – (i) and Table 14	content of semiannual compliance reports
63.5895(d)	list individual resins and gelcoats and application methods in semiannual compliance reports

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

(2) The permittee shall submit semiannual 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)(1) – (Q)(2)	semiannual compliance reports
OAC rule 3745-21-25 (Q)(3)(a) – (Q)(3)(h)	content of semiannual compliance reports
OAC rule 3745-21-25(O)(2)(c)	list individual resins and gelcoats and application methods in semiannual 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 that include the following information:

a. an identification of each month when the OC emissions exceeded 134 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 02-23000]

(4) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the baghouse during the period of time in which the emissions unit was in operation:

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;

d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

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)]

(5) 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>:

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

<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.

[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 demonstrated based upon the record keeping requirements specified in d)(4), d)(5) and 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 134 lbs/month and 0.80 ton/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 (134 lbs/month) by 12 months per year, and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the monthly allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-23000]

d. Emission Limitation:

PE shall not exceed 0.87 lb/hr and 3.8 tons/year.

Applicable Compliance Method:

Compliance with the hourly PE limitation shall be demonstrated by using Method 5 as outlined in 40 CFR Part 60, Appendix A. No testing is specifically required by this permit but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A). Such testing may be required at opacity levels less than those required by the visible emissions limit in section b) of these terms and conditions.

The tpy emission limitation was developed by multiplying the short-term allowable PE limitation (0.87 lb/hr) by the maximum annual hours of operation (8,760 hours), 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 02-23000]

e. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-23000]

g) Miscellaneous Requirements

(1) None.

2. P019, Vacuum Infusion Molding (VIM)

Operations, Property and/or Equipment Description:

Vacuum Infusion 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.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 - 63.5935)	No organic hazardous air pollutants (HAP) emissions standards.
b.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 - 63.5935)	No work practice standards for this type of closed molding.
c.	40 CFR Part 63.1 – 63.16 (40 CFR 63.5925)	Table 15 to Subpart WWWW - Applicability of General Provisions, Subpart A.
d.	OAC rule 3745-21-25	Excluded from any requirements in this rule, OAC rule 3745-21-25(C)(2)(k).
e.	OAC rule 3745-31-05(D) (PTI P0108474)	Total organic compound (OC) emissions emitted from all resins applied to molds from emissions units P004 – P016, P019 – P020 and P022 – P037, shall not exceed 89.7 tons per year, as a rolling, 12-month summation.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The total OC emissions employed in resins applied to molds from emissions units P004 – P016, P019 – P020 and P022 – P037 shall be restricted so as to not cause OC emissions to exceed 89.7 tons per year, as a rolling, 12-month summation.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0108474]

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 resin applied;

b. pounds of each resin applied; and

c. the weight percent of available OC monomer (styrene and methyl methacrylate) for each resin applied.

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

(2) The permittee shall maintain the following monthly records for emissions units P004 – P016, P019 – P020 and P022 – P037:

a. the total OC emission rate for all resins applied from emissions units P004 – P016, P019 – P020 and P022 – P037 as calculated by the following equation, in tons per year, as a rolling, 12-month summation:

$$\text{OC (ton/12month rolling avg.)} = 1/2000 \sum_{i}^{n} [(W)(P)]\ i \text{ x EF}$$

where:

W = the weight of each resin applied, as recorded in d)(1)b;
P = the percent of available OC monomer, by weight, of each resin applied, as recorded in d)(1)c;
i = pounds of available OC monomer in each resin, i, applied;
n = number of resins applied; and
EF = each emissions factor.

A site-specific emissions factor was developed by CW Ohio on August 20, 21 and 22, 2007. This site-specific emission factor was established at 0.0211 lb of HAP emissions emitted / lb of available HAP (styrene), (42.2 lb of HAP emissions emitted / ton of available HAP (styrene)), which is equivalent to 0.0211 lb of OC emissions emitted / lb of available OC monomer, (42.2 lbs of OC emissions emitted / tons of available OC monomer)

Note: Available OC monomers include all available OC monomers and available organic HAP monomers in each resin as applied (e.g., styrene, vinyl toluene, methyl methacrylate, and etc.). The product [(W)(P)] is the amount of available OC monomers, in pounds, of each resin applied.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0108474]

e) Reporting Requirements

(1) 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 total OC emissions exceeded 89.7 tons per year, as a rolling, 12-month summation from emissions units P004 – P016, P019 – P020 and P022 – P037 and the actual OC emissions for each 12-month summation.

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)]

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

Total OC emissions emitted from all resins applied to molds from emissions units P004 – P016, P019 – P020 and P022 – P037 shall not exceed 89.7 tons per year, as a rolling, 12-month summation.

<u>Applicable Compliance Method</u>:

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

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

g) Miscellaneous Requirements

(1) None.

3. P021, Porch Post FRP Molding

Operations, Property and/or Equipment Description:

Porch Post FRP 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.	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 40 CFR 63.5805, Subpart WWWW. See b)(2)a, Table 3 of Subpart WWWW.
b.	40 CFR Part 63.1 – 63.16 (40 CFR 63.5925)	Table 15 to Subpart WWWW – Applicability of General Provisions, Subpart A.
c.	OAC rule 3745-31-05(A)(3) (PTI P0110174)	Organic compound (OC) emissions shall not exceed 657 lbs/month and 3.9 tons/year.
d.	OAC rule 3745-21-25(D)	Volatile organic compounds (VOC) emissions shall not exceed emissions standards as specified in OAC rule 3745-21-25(D)(2). See b)(2)b, Table 2 of OAC rule 3745-21-25.

(2) Additional Terms and Conditions

a. 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.

b. 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. 3 b/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]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.

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 the following 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 available OC monomer (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:

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

where:

W = weight of each resin, i, applied (a ton of resin is before the additions of additives such as powders, fillers, glass…etc, but include monomer additions), as recorded in d)(7)b;
i = a specific resin applied during the month;
n = total number of resins applied during the month; 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 P0110174]

e) Reporting Requirements

(1) The permittee shall submit semiannual 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	semiannual compliance reports
63.5910(c) – (i) and Table 14	content of semiannual compliance reports
63.5895(d)	list individual resins and gelcoats and application methods in semiannual compliance reports

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

(2) The permittee shall submit semiannual 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)(1) – (Q)(2)	semiannual compliance reports
OAC rule 3745-21-25 (Q)(3)(a) – (Q)(3)(h)	content of semiannual compliance reports
OAC rule 3745-21-25(O)(2)(c)	list individual resins and gelcoats and application methods in semiannual 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 that include the following information:

a. an identification of each month when the OC emissions exceeded 657 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 P0110174]

(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.

[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>:

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

<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.

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

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

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

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.

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

c. Emission Limitation:

OC emissions shall not exceed 657 lbs/month and 3.9 tons/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 (657 lbs/month) by 12 months per year, and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the monthly allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110174]

g) Miscellaneous Requirements

(1) None.

4. P039, Column Sanding

Operations, Property and/or Equipment Description:

Column sanding and baghouse filtration

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 02-20448)	Particulate emissions (PE) shall not exceed 0.023 lb/hr and 0.1 ton/yr. Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average.
b.	OAC rule 3745-17-11	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(A)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled

emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1 to 8 inches of water.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the baghouse during the period of time in which the emissions unit was in operation:

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

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)]

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>:

PE shall not exceed 0.023 lb/hr and 0.1 ton/yr.

Applicable Compliance Method:

Compliance with the hourly PE limitation shall be demonstrated by using Method 5 as outlined in 40 CFR 60, Appendix A. No testing is specifically required by this permit but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A). Such testing may be required at opacity levels less than those required by the visible emissions limit in section b) of these terms and conditions.

The tpy emission limitation was developed by multiplying the short-term allowable PE limitation (0.023 lb/hr) by the maximum annual hours of operation (8,760 hours), 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 02-20448]

b. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible emission observations performed in accord with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20448]

g) Miscellaneous Requirements

(1) None.

5. P040, Pultrusion high shear resin mixer

Operations, Property and/or Equipment Description:

Pultrusion high shear resin mixer

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) as effective 11/30/01 (PTI P0107595)	Organic compound (OC) emissions shall not exceed 2,417 lbs/month and 14.5 tons/year.
b.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(1)a, c)(1)b and c)(1)c.\.
c.	40 CFR Part 63.1 – 63.16 (40 CFR 63.5925)	Table 15 to Subpart WWWW – Applicability of General Provisions, Subpart A.
d.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
e.	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.9 lb/hr.
f.	OAC rule 3745-31-05(A)(3)(a)(ii) as effective 12/01/06	PE shall be less than 10.0 tons/yr. See b)(2)a.
g.	OAC rule 3745-21-25(D)	Work practice standards in Table 1 of OAC rule 3745-21-25. See c)(1)a, c)(1)b and c)(1)c.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the calculated annual emission rate for particulate emissions is less than ten tons per year taking into account the federally enforceable rule limit of 0.9 lb PE/hr under OAC rule 3745-17-11.

c) Operational Restrictions

(1) The permittee shall meet the following work practice standards:

a. use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;

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

c. keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-21-25 and 40 CFR Part 63, Subpart WWWW]

d) Monitoring and/or Recordkeeping Requirements

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

63.5915(a)	copy of compliance notification(s) and report(s)
63.5915(d)	certified statement of compliance with work practice requirements
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]

(2) 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(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)(e)	a certified statement that operations are in compliance with the work practice standards specified in Table 1 of OAC rule 3745-21-25, as applicable.
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]

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

a. the company identification for each resin mix;

b. pounds of each resin mix produced;

c. the weight percent of available OC monomer for each resin mix produced; and

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

$$\mathrm{OC}\left(\frac{\mathrm{lbs}}{\mathrm{month}}\right) = \sum_{i}^{n}[(W)(P)]i \text{ x } EF$$

where:

W = the weight of each resin applied, as recorded in d)(3)b;
P = the percent of OC monomer, by weight, of each resin applied, as recorded in d)(3)c;
i = pounds of available OC monomer in each resin, i, applied;
n = number of resins applied; and
EF = each emissions factor.

EF = 0.000292 lb of VOC emissions emitted / lb of available organic HAP input (0.584 lb of VOC emissions emitted / ton of available organic HAP input), which is equivalent to 0.000292 lb of OC emissions emitted / lb of available OC monomer, (0.584 lbs of OC emissions emitted / tons of available OC monomer). This EF was developed from emissions testing performed on emissions unit P012, conducted on June 11, 1998 at Premix Inc, a similar source.

Note: Available OC monomers include all available OC monomers and available organic HAP monomers in each resin as applied (e.g., styrene, vinyl toluene, methyl methacrylate, and etc.). The product [(W)(P)] is the amount of available OC monomers, in pounds, of each resin mix produced.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0107595]

(4) The permittee shall perform daily inspections of the mixer when resin is present in the mixing vessel, and record the following information:

a. the date and reason why any required inspection was not performed;

b. the date and all times the mixer cover was not closed over the mixing vessel, when actual mixing is occurring, except when adding materials or changing covers to the mixing vessel;

c. the date and all times the mixer vents were not closed over the mixing vessel, when actual mixing is occurring, except that venting is allowed during additions of materials, or as necessary prior to adding materials or opening the cover for safety;

d. the date and all times when visible gaps were present in the mixer cover, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation when the mixer cover was properly employed; and

e. 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 P0107595]

e) Reporting Requirements

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

a. each month when OC emissions exceeded the OC emissions limit of 2,417 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 P0107595]

(2) The permittee must submit semiannual compliance reports:

a. if there are no deviations from the work practice standards in c)(1)a, c)(1)b and c)(1)c, provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., (1) used mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch were permissible around mixer shafts and any required instrumentation; (2) closed any mixer vents when actual mixing was occurring, except that venting was allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and (3) kept the mixer covers closed while actual mixing was occurring except when adding materials or changing covers to the mixing vessels.); and

b. if there were deviations with the work practice standards in c)(1)a, c)(1)b and c)(1)c, 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 3745-77-07(C)(1), OAC rule 3745-21-25(D) and 40 CFR, Part 63, Subpart WWWW]

(3) 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 Limitation:

OC emissions shall not exceed 2,417 lbs/month and 14.5 tons/year.

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:

PE shall not exceed 0.9 lb/hr and less than 10 tons/year.

Applicable Compliance Method:

Compliance with the hourly PE limitation shall be demonstrated by using Method 5 as outlined in 40 CFR Part 60, Appendix A. No testing is specifically required by this permit but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A). Such testing may be required at opacity levels less than those required by the visible emissions limit in section b) of these terms and conditions.

The tpy emission limitation was developed by multiplying the short-term allowable PE limitation (0.9 lb/hr) by the maximum annual hours of operation (8,760 hours), 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.

c. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0107595]

g) Miscellaneous Requirements

(1) None.

6. P044, Mold preparation, lance cleaning and cleanup operations

Operations, Property and/or Equipment Description:

Mold preparation, lance cleaning and cleanup operations (excluding coating operations)

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 P0112463)	Total organic compound (OC) emissions emitted from all mold preparation materials (mold strippers and releases) and cleanup materials (cleanup and lance cleaners), from all fiberglass reinforced plastic operations, excluding coating operations, shall not exceed 30 tons per year. See c)(1) and c)(2).
b.	OAC rule 3745-21-07(M)(5)(a) For cleanup only	Exempt from the emission limit standards in OAC rule 3745-21-07(M)(2).
c.	OAC rule 3745-21-25(D)(1) For cleanup only	Work practice standards in Table 1 of OAC rule 3745-21-25: 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. See b(2)a for operations excluded from this rule. See b(2)b for definition for “cleaning” from this rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935) For cleanup only	Work practice standards in Table 4 of Subpart WWWW: 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. The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See b(2)a for operations excluded from the rule. See b(2)b for definition for "cleaning" from this rule.
e.	40 CFR Part 63.1 – 63.16 For cleanup only	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

a. The following operations and materials are specifically excluded from any requirements in this rule:

i. application of mold sealing and release agents; and

ii. mold stripping and cleaning.

b. "Cleaning" means removal of composite materials, such as cured and uncured resin from equipment, finished surfaces, floors, hands of employees, or any other surfaces.

c) Operational Restrictions

(1) The permittee shall not use any mold releases, mold strippers and cleaners, cleanup materials or lance cleaners that contain HAP.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0112463]

(2) The permittee shall not use any cleanup that contains VOC, except for lance cleaning and lance parts cleaning, mold stripping and cleaning, and for removal of cured resin in closed systems.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0112463]

d) Monitoring and/or Recordkeeping Requirements

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

63.5915(a)	copy of compliance notification(s) and report(s)
63.5915(d)	certified statement of compliance with work practice requirements
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]

(2) 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(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)(e)	a certified statement that operations are in compliance with the work practice standards specified in Table 1 of OAC rule 3745-21-25, as applicable.
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]

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

a. the name and identification number of each cleanup, lance cleaner, mold release and mold stripper applied;

b. an identification of each cleanup, lance cleaner, mold release and mold stripper applied as to whether it is a VOC or HAP;

c. density and OC weight fraction or density and OC volume fraction of each cleanup, lance cleaner, mold release and mold stripper applied;

d. weight or volume of each cleanup, lance cleaner, mold release and mold stripper applied;

e. OC emission rate for all cleanup, lance cleaners, mold releases and mold strippers applied, in lbs/month;

f. if a credit for recovered cleanup materials (cleanup and lance cleaners) is to be used to demonstrate compliance, records of the total amount (lbs) of cleanup material collected and added to the recovery container, for recycle, recovery, and/or disposal at an outside facility, shall be maintained in the following manner:

i. the date the materials from the recovery container were shipped off site; and

ii. the number of gallons or pounds of materials from the recovery container shipped off site; and

g. a credit of recovered cleanup material (cleanup and lance cleaners) may be used to adjust to amount of OC emissions in section d)(3)e.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0112463]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. an identification of each month when any cleanup, lance cleaner, mold release and/or mold stripper was used and contained HAP, and the actual monthly HAP emissions for each such month; and

b. except for lance cleaning and lance parts cleaning, mold stripping and cleaning, and for removal of cured resin in closed systems, an identification of each month when any cleanup was used and contained VOC, and the actual monthly VOC 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 P0112463]

(2) The permittee must submit semiannual compliance reports:

a. if there are no deviations from the work practice standard in b)(1)c, 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)(1)d, 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)(1)c and b)(1)d, 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 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW and OAC rule 3745-21-25(D)(1)]

(3) 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>:

Total OC emissions emitted from all mold preparation materials (mold strippers and releases), cleanup materials (cleanup and lance cleaners), from fiberglass reinforced plastic operations, excluding coating operations, shall not exceed 30 tons per year.

<u>Applicable Compliance Method</u>:

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0112463]

g) Miscellaneous Requirements

(1) None.

7. R002, Paint spray booth

Operations, Property and/or Equipment Description:

Paint spray booth

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 63, Subpart QQQQ (40 CFR 63.4680 – 63.4781)	Organic hazardous air pollutants (HAP) shall not exceed emissions standards as specified in 40 CFR 63.4690, Subpart QQQQ. See b)(2)a, Table 2 of Subpart QQQQ.
b.	40 CFR Part 63.1 – 63.16 (40 CFR 63.4701)	Table 4 to Subpart QQQQ - Applicability of General Provisions, Subpart A.
c.	OAC rule 3745-31-05(A)(3) (PTI 02-1777)	No annual limit stated in PTI 02-1777.
d.	OAC rule 3745-17-11(C)	See c)(1), c)(2) and d)(4) through d)(8).

(2) Additional Terms and Conditions

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

40 CFR 63.4690, Subpart QQQQ	Table 2(emission limits for existing affected sources)
If the affected source applies coating to products in the following subcategory. . .	Then, the organic HAP emission limit for the affected source, in grams HAP/liter solids (lb HAP/gal solids) [1,2] is:
1. Exterior siding and primed doorskins.	7 (0.06)

2. Flooring	93 (0.78)
3. Interior wall paneling or tileboard.	183 (1.53)
4. Other interior panels	20 (0.17)
5. Doors, windows, and miscellaneous.	231 (1.93)

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 3745-77-07(A)(1)]

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

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall utilize one or more compliance options, as specified in 40 CFR 63.4691 to demonstrate compliance with the emission standards in Table 2 of this subpart, as described in the following sections:

63.4691(a)	compliant material option (each coating you use must have a lower organic HAP content than the applicable emission limit and each thinner and cleaning material you use must contain no organic HAP)
63.4691(b)	emission rate without add-on controls option (the combination of coatings, thinners, and cleaning materials you use must have a lower organic HAP emission rate than the applicable organic HAP emission limit)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.4691]

(2) The permittee is currently demonstrating compliance through the option specified in 63.4691(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. For each compliance period to demonstrate continuous compliance, you must use no coating for which the organic HAP content determined using Equation 2 of § 63.4741 exceeds the applicable emission limit in § 63.4690; and use no thinner or cleaning material that contains organic HAP, determined according to § 63.4741(a). A compliance period consists of 12 months. Each month after the

end of the initial compliance period described in § 63.4740 is the end of a compliance period consisting of that month and the preceding 11 months.

b. If you choose to comply with the emission limitations by using the compliant material option, the use of any coating, thinner, or cleaning material that does not meet the criteria specified in paragraph (a) of this section is a deviation from the emission limitations that must be reported as specified in §§ 63.4710(c)(6) and 63.4720(a)(5).

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 63.4691(b), as appropriate.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.4691]

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

63.4730(a)	copy of compliance notification(s) and report(s)
63.4730(b),(c)(1), (c)(2), (d) – (g) and (j)	records of all calculations and data used to demonstrate compliance using the compliant material option
63.4731(a) – (c)	record keeping format and retention requirements

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

(4) 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 Ohio EPA Northeast District Office upon request.

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

(5) 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 3745-77-07(C)(1)]

(6) 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 3745-77-07(C)(1)]

(7) 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 the 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 Ohio EPA Northeast District Office upon request.

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

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

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

e) Reporting Requirements

(1) The permittee shall submit semiannual 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 QQQQ, pursuant to the following sections:

63.4720(a)(1) – (a)(2)	semiannual compliance reports
63.4720(a)(3) – (a)(5)	content of semiannual compliance reports

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

(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 Limitation:

(40 CFR 63.4690, Subpart QQQQ, Table 2)
Organic HAP emission limitations in b)(2)a.

Applicable Compliance Method:

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

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

g) Miscellaneous Requirements

(1) None.

8. R003, Dip tank Wood Life

Operations, Property and/or Equipment Description:

Dip tank Wood Life

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.	40 CFR Part 63, Subpart QQQQ (40 CFR 63.4680 – 63.4781)	Organic hazardous air pollutants (HAP) shall not exceed emissions standards as specified in 40 CFR 63.4690, Subpart QQQQ. See b)(2)a, Table 2 of Subpart QQQQ.
b.	40 CFR Part 63.1 – 63.16 (40 CFR 63.4701)	Table 4 to Subpart QQQQ – Applicability of General Provisions, Subpart A.

(2) Additional Terms and Conditions

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

40 CFR 63.4690, Subpart QQQQ	Table 2 (emission limits for existing affected sources)
If the affected source applies coating to products in the following subcategory. . .	Then, the organic HAP emission limit for the affected source, in grams HAP/liter solids (lb HAP/gal solids) [1,2] is:
1. Exterior siding and primed doorskins.	7 (0.06)
2. Flooring	93 (0.78)

3. Interior wall paneling or tileboard.	183 (1.53)
4. Other interior panels	20 (0.17)
5. Doors, windows, and miscellaneous.	231 (1.93)

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 63.4691 to demonstrate compliance with the emission standards in Table 2 of this subpart, as described in the following sections:

63.4691(a)	compliant material option (each coating you use must have a lower organic HAP content than the applicable emission limit and each thinner and cleaning material you use must contain no organic HAP)
63.4691(b)	emission rate without add-on controls option (the combination of coatings, thinners, and cleaning materials you use must have a lower organic HAP emission rate than the applicable organic HAP emission limit)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.4691]

(2) The permittee is currently demonstrating compliance through the option specified in 63.4691(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. For each compliance period to demonstrate continuous compliance, you must use no coating for which the organic HAP content determined using Equation 2 of § 63.4741 exceeds the applicable emission limit in § 63.4690; and use no thinner or cleaning material that contains organic HAP, determined according to § 63.4741(a). A compliance period consists of 12 months. Each month after the end of the initial compliance period described in § 63.4740 is the end of a compliance period consisting of that month and the preceding 11 months.

b. If you choose to comply with the emission limitations by using the compliant material option, the use of any coating, thinner, or cleaning material that does not meet the criteria specified in paragraph (a) of this section is a deviation from the emission limitations that must be reported as specified in §§ 63.4710(c)(6) and 63.4720(a)(5).

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 63.4691(b), as appropriate.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.4691]

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

63.4730(a)	copy of compliance notification(s) and report(s)
63.4730(b),(c)(1), (c)(2), (d) – (g) and (j)	records of all calculations and data used to demonstrate compliance using the compliant material option
63.4731(a) – (c)	record keeping format and retention requirements

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

e) Reporting Requirements

(1) The permittee shall submit semiannual 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 QQQQ, pursuant to the following sections:

63.4720(a)(1) – (a)(2)	semiannual compliance reports
63.4720(a)(3) – (a)(5)	content of semiannual compliance reports

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

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

(40 CFR 63.4690, Subpart QQQQ, Table 2)
Organic HAP emission limitations in b)(2)a.

Applicable Compliance Method:

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

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

g) Miscellaneous Requirements

(1) None.

9. R004, Open top paint dip tank

Operations, Property and/or Equipment Description:

Open top paint dip tank

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.	40 CFR Part 63, Subpart QQQQ (40 CFR 63.4680 – 63.4781)	Organic hazardous air pollutants (HAP) shall not exceed emissions standards as specified in 40 CFR 63.4690, Subpart QQQQ. See b)(2)a, Table 2 of Subpart QQQQ.
b.	40 CFR Part 63.1 – 63.16 (40 CFR 63.4701)	Table 4 to Subpart QQQQ - Applicability of General Provisions, Subpart A.

(2) Additional Terms and Conditions

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

40 CFR 63.4690, Subpart QQQQ	Table 2 (emission limits for existing affected sources)
If the affected source applies coating to products in the following subcategory. . .	Then, the organic HAP emission limit for the affected source, in grams HAP/liter solids (lb HAP/gal solids) [1,2] is:
1. Exterior siding and primed doorskins.	7 (0.06)
2. Flooring	93 (0.78)

3. Interior wall paneling or tileboard.	183 (1.53)
4. Other interior panels	20 (0.17)
5. Doors, windows, and miscellaneous.	231 (1.93)

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 63.4691 to demonstrate compliance with the emission standards in Table 2 of this subpart, as described in the following sections:

63.4691(a)	compliant material option (each coating you use must have a lower organic HAP content than the applicable emission limit and each thinner and cleaning material you use must contain no organic HAP)
63.4691(b)	emission rate without add-on controls option (the combination of coatings, thinners, and cleaning materials you use must have a lower organic HAP emission rate than the applicable organic HAP emission limit)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.4691]

(2) The permittee is currently demonstrating compliance through the option specified in 63.4691(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. For each compliance period to demonstrate continuous compliance, you must use no coating for which the organic HAP content determined using Equation 2 of § 63.4741 exceeds the applicable emission limit in § 63.4690; and use no thinner or cleaning material that contains organic HAP, determined according to § 63.4741(a). A compliance period consists of 12 months. Each month after the end of the initial compliance period described in § 63.4740 is the end of a compliance period consisting of that month and the preceding 11 months.

b. If you choose to comply with the emission limitations by using the compliant material option, the use of any coating, thinner, or cleaning material that does not meet the criteria specified in paragraph (a) of this section is a deviation from the emission limitations that must be reported as specified in §§ 63.4710(c)(6) and 63.4720(a)(5).

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 63.4691(b), as appropriate.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.4691]

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

63.4730(a)	copy of compliance notification(s) and report(s)
63.4730(b),(c)(1), (c)(2), (d) – (g) and (j)	records of all calculations and data used to demonstrate compliance using the compliant material option
63.4731(a) – (c)	record keeping format and retention requirements

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

e) Reporting Requirements

(1) The permittee shall submit semiannual 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 QQQQ, pursuant to the following sections:

63.4720(a)(1) – (a)(2)	semiannual compliance reports
63.4720(a)(3) – (a)(5)	content of semiannual compliance reports

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

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

(40 CFR 63.4690, Subpart QQQQ, Table 2)
Organic HAP emission limitations in b)(2)a.

<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.

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

g) Miscellaneous Requirements

(1) None.

10. Emissions Unit Group -Mixers: P003, P018 and P038

EU ID	Operations, Property and/or Equipment Description
P003	No. 1 high shear mixer, shares common dust collector and day tanks
P018	No. 2 high shear mixer, shares common dust collector and day tanks
P038	No. 3 high shear mixer, shares common dust collector and day tanks

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 02-12673) (PTI 02-13602) (PTI P0110194)	Organic compound (OC) emissions shall not exceed 7.3 tons/year. Particulate emissions (PE) shall not exceed 0.18 lb/hr and 0.79 ton/year. Visible particulate emissions from any stack shall not exceed 5% opacity as a 6-minute average.
b.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(1)a, c)(1)b and c)(1)c.
c.	40 CFR Part 63.1 – 63.16 (40 CFR 63.5925)	Table 15 to Subpart WWWW – Applicability of General Provisions, Subpart A.
d.	OAC rule 3745-17-07(A)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-21-25(D)	Work practice standards in Table 1 of OAC rule 3745-21-25. See c)(1)a, c)(1)b and c)(1)c.

(2) Additional Terms and Conditions

a. The particulate emissions from the emissions units listed above shall be vented to the baghouse when one or more of the emissions units are in operation. No venting shall occur during actual mixing, except when adding materials (see section c)(1)b below).

c) Operational Restrictions

(1) The permittee shall meet the following work practice standards:

a. use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;

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

c. keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

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

d) Monitoring and/or Recordkeeping Requirements

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

63.5915(a)	copy of compliance notification(s) and report(s)
63.5915(d)	certified statement of compliance with work practice requirements
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]

(2) 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(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)(e)	a certified statement that operations are in compliance with the work practice standards specified in Table 1 of OAC rule 3745-21-25, as applicable.
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]

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

a. the company identification for each resin mix;

b. pounds of each resin mix produced;

c. the weight percent of available OC monomer (e.g., styrene, and/or methyl methacrylate) for each resin mix produced; and

a. the total OC emission rate for all resin mix produced, as calculated by the following equation, in pounds per month:

$$\mathrm{OC}\left(\frac{\mathrm{lbs}}{\mathrm{month}}\right) = \sum_{\mathrm{i}}^{\mathrm{n}} [(\mathrm{W})(\mathrm{P})]\mathrm{i} \text{ x } \mathrm{EF}$$

where:

W = the weight of each resin applied, as recorded in d)(3)b;
P = the percent of available OC monomer, by weight, of each resin applied, as recorded in d)(3)c;
i = pounds of available OC monomer in each resin, i, applied;
n = number of resins applied; and
EF = each emission factor.

EF = 0.000292 lb of VOC emissions emitted / lb of available organic HAP input (0.584 lb of VOC emissions emitted / ton of available organic HAP input), which is equivalent to 0.000292 lb of OC emissions emitted / lb of available OC monomer, (0.584 lbs of OC emissions emitted / tons of available OC monomer). This EF was developed from emissions testing performed on emissions unit P012, conducted on June 11, 1998 at Premix Inc, a similar source.

Note: Available OC monomers include all available OC monomers and available organic HAP monomers in each resin as applied (e.g., styrene, vinyl toluene, methyl methacrylate, and etc.). The product [(W)(P)] is the amount of available OC monomers, in pounds, of each resin mix produced.

[Authority for term: OAC rule 3745-77-07(C)(1), PTI 02-12673 and PTI 02-13602]

(4) The permittee shall perform daily inspections of the mixer when resin is present in the mixing vessel, and record the following information:

a. the date and reason why any required inspection was not performed;

b. the date and all times the mixer cover was not closed over the mixing vessel, when actual mixing is occurring, except when adding materials or changing covers to the mixing vessel;

c. the date and all times the mixer vents were not closed over the mixing vessel, when actual mixing is occurring, except that venting is allowed during additions of materials, or as necessary prior to adding materials or opening the cover for safety;

d. the date and all times when visible gaps were present in the mixer cover, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation when the mixer cover was properly employed; and

e. 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 P0110194]

(5) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1 to 3 inches of water.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110194]

e) Reporting Requirements

(1) The permittee must submit semiannual compliance reports:

a. if there are no deviations from the work practice standards in c)(1)a – c)(1)c, provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., (1) used mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch were permissible around mixer shafts and any required instrumentation; (2) closed any mixer vents when actual mixing was occurring, except that venting was allowed

during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and (3) kept the mixer covers closed while actual mixing was occurring except when adding materials or changing covers to the mixing vessels.); and

b. if there were deviations with the work practice standards in c)(1)a, c)(1)b and c)(1)c, 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 3745-77-07(C)(1), OAC rule 3745-21-25(D), 40 CFR Part 63, Subpart WWWW and P0110194]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the baghouse during the period of time in which the emissions unit(s) was/were in operation:

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was\were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

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 P0110194]

(3) 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) and PTI P0110194]

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 7.3 tons/year.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1), PTI 02-12673 and PTI 02-13602]

b. Emission Limitation:

PE shall not exceed 0.18 lb/hr and 0.79 ton/year.

Applicable Compliance Method:

Compliance with the hourly PE limitation shall be demonstrated by using Method 5 as outlined in 40 CFR Part 60, Appendix A. No testing is specifically required by this permit but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A). Such testing may be required at opacity levels less than those required by the visible emissions limit in section b) of these terms and conditions.

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.18 lb/hr) by the maximum annual hours of operation (8,760 hours), 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), PTI 02-12673 and PTI 02-13602]

c. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1), PTI 02-12673 and PTI 02-13602]

g) Miscellaneous Requirements

(1) None.

11. Emissions Unit Group -Pultrusion units: P041, P042 and P043

EU ID	Operations, Property and/or Equipment Description
P041	Pultrusion unit 1
P042	Pultrusion unit 2
P043	Pultrusion unit 3

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.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Reduce total organic hazardous air pollutants (HAP) emissions by at least 60 weight percent as specified in 40 CFR 63.5805 and Table 3. See c)(1).
b.	40 CFR Part 63.1 – 63.16 (40 CFR 63.5925)	Table 15 to Subpart WWWW – Applicability of General Provisions, Subpart A.
c.	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(E).
d.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as 6-minute average, except as provided by the rule.
e.	OAC rule 3745-31-05(E), as effective 12/01/06 (PTI P0110175)	Particulate emissions (PE) shall be less than 10.0 tons/yr. Total organic HAP/VOC emissions shall be less than 10.0 tons/yr. See b)(2)a and b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI P0110175)	Organic compound (OC) emissions shall not exceed 1,216 lbs/month and 7.3 tons/year. See b)(2)c.
g.	OAC rule 3745-21-25(D)	Reduce volatile organic compounds (VOC) emissions by at least 60 percent by weight. See c)(1).

(2) Additional Terms and Conditions

a. Permit to Install P0110175 for this air contaminant source takes into account the use of a fabric filter system, whenever this air contaminant source is in operation, with a minimum control efficiency of 90%, by weight for PE, as a voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

b. Permit to Install P0110175 for this air contaminant source takes into account the use of a wet area enclosure and resin drip collection system that meet the criteria in c)(1), whenever this air contaminant source is in operation, with a minimum control efficiency of 60%, by weight for total organic HAP/VOCs, as a voluntary restriction as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3).

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

c) Operational Restrictions

(1) To demonstrate compliance with emissions limits in b)(1)a and b)(1)g for reducing emissions by at least 60 percent by weight, the permittee shall design, install and operate a wet area enclosure and resin drip collection system on each pultrusion machine that meet the criteria below:

The criteria for each pultrusion machine, with no radio frequency pre-mold heat unit, no direct die injection or preform injection system, are as follows:

a. The enclosure must cover and enclose the open resin bath and the forming area in which reinforcements are pre-wet or wet-out and moving toward the die. The surfaces of the enclosure must be closed except for openings to allow material to enter and exit the enclosure.

b. The enclosure must extend from the beginning of the resin bath to within 0.5 inch or less of the die entrance.

c. The total open area of the enclosure must not exceed 2 (two) times the cross sectional area of the puller window and must comply with the following:

   i. All areas which are open need to be included in the total open area calculation with the exception of access panels, door and/or hatches that are part of the enclosure.

   ii. The area which is displaced by entering reinforcement or exiting product is considered open.

   iii. Areas covered by brush covers are considered closed.

d. Open areas for level control devices, monitoring devices, agitation shafts, and fill hoses must have no more than 1.0 inch clearance.

e. The access panels, doors, and/or hatches that are part of the enclosure must close tightly. Damaged access panels, doors, and/or hatches that do not close tightly must be replaced.

f. The enclosure may not be removed from the pultrusion line, and access panels, doors, and/or hatches that are part of the enclosure must remain closed whenever resin is in the bath, except for the following periods of time in c)(1)g of this section.

g. The maximum length of time the enclosure may be removed from the pultrusion line or the access panels, doors, and/or hatches and may be open is:

   i. 30 minutes per any 8 hour shift;

   ii. 45 minutes per any 12 hour shift; or

   iii. 90 minutes per any day, if the machine operates 24 hours in a day.

   The time restrictions do not apply if the open doors or panels do not cause the limit of two times the puller window area to be exceeded.

   The facility may average the times that access panels, doors, and/or hatches are open across all operating lines. In that case the average must not exceed the times shown above. All lines included in the average must have operated the entire time period being averaged.

h. No fans, blowers, and/or air lines may be allowed within the enclosure. The enclosure must not be ventilated.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-21-25(I) and 40 CFR Part 63.5830]

d) Monitoring and/or Recordkeeping Requirements

(1) 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)	records of resin and gel coat use, organic HAP content and operation where resin is used
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]

(2) 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)(2)(b)	records of resin and gel coat use, monomer content and operation where it was used
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]

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

a. the company identification for each resin applied;

b. pounds of each resin applied;

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

d. the total OC emission rate for all resins applied, as calculated by the following equation, in tons/yr:

$$\text{OC (lb/month)} = (1 - 0.60) \text{ x } (\frac{1}{2000}) \text{ x } \sum_{i}^{n} [(W)(P)] \text{ i x EF}$$

where:
W = the weight of each resin applied, as recorded in d)(3)b;
P = the percent of available OC monomer, by weight, of each resin applied, as recorded in d)(3)c;
i = pounds of available OC monomer in each resin, i, applied;
n = number of resins applied; and
EF = each emissions factor.

EF = 0.04 lb of OC emissions emitted / lb of available OC monomer resin applied (US EPA's AP-42, Fifth Edition, Volume I Chapter 4: Evaporation Loss Sources, Section 4.4, Table 4.4-2. Emission Factors for Uncontrolled Polyester Resin Production Fabrication Processes, February 2007, or the use of an EF with the written approval from Ohio EPA).

0.60 = emissions reduction limit, by weight (0.60 organic HAP emissions reduction limit, by weight, is achieved by meeting the requirements in c)(1).

Note: Available OC monomers include all available OC monomers and available organic HAP monomers in each resin as applied (e.g., styrene, vinyl toluene, methyl methacrylate, and etc.). The product [(W)(P)] is the amount of available OC monomers, in pounds, of each resin mix produced.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110175]

(4) The permittee shall inspect daily the wet area enclosure when there is resin present in the resin bath, and record the following information:

a. the date and reason why any required inspection was not performed;

b. the date and all times the enclosure was not in place over the resin bath and there was resin present in the resin bath;

c. the date and all times the enclosure's access panels, doors, hatches or covers were open and there was resin present in the resin bath;

d. the date and all times and cause(s) when the wet area enclosure and resin drip collection system did not meet each criterion in c)(1); and

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

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.5895(e), OAC rule 3745-21-25(O)(2)(d) and PTI P0110175]

(5) The permittee shall maintain a weekly log of filter replacements and any maintenance of the fabric filter system.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110175]

(6) The permittee shall properly operate the fabric filter system and check it at least once per week when the emissions unit is in operation. The permittee shall record all periods of time during which the fabric filter system was not in operation when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110175]

e) Reporting Requirements

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

a. the length of time, when the particulate control filter was not in service when the emissions unit was in operation; and

b. an identification of each month when the OC emissions exceeded 1,216 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 P0110175]

(2) The permittee must submit semiannual compliance reports:

a. If there were no deviations with the emissions limit of reducing total organic HAP emissions by at least 60 weight percent, provide a statement that there were no deviations with this emissions limit, i.e., the total organic HAP emissions were reduced by at least 60 weight percent because each pultrusion machine met the criteria in section c)(1) during the reporting period;

b. If there were deviations with the emissions limit of reducing total organic HAP emissions by at least 60 weight percent, provide the total operating time of each 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;

c. If there were no deviations with the emissions limit of reducing VOC emissions by at least 60 weight percent, provide a statement that there were no deviations with this emissions limit, i.e., VOC emissions were reduced by at least 60 weight percent because each pultrusion machine met the criteria in section c)(1) during the reporting period; and

d. If there were deviations with the emissions limit of reducing VOC emissions by at least 60 weight percent, provide the total operating time of each 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 by July 31 or January 31, respectively.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25(D) and 40 CFR Part 63, Subpart WWWW and PTI P0110175]

(3) 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>:

Reduce total organic HAP emissions by at least 60 weight percent as specified in 40 CFR 63.5805 and Table 3.

<u>Applicable Compliance Method</u>:

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

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 18, 25, 25A, 204, 204A – F, 205 or other approved methods as appropriate.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110175]

b. Emission Limitation:

Reduce VOC emissions by at least 60 percent by weight.

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 18, 25, 25A, 204, 204A – F, 205 or other approved methods as appropriate.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110175]

c. Emission Limitation:

OC emissions shall not exceed 1,216 lbs/month and 7.3 tons/year.

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25, 25A, 204, 204A – F, 205 or other approved methods as appropriate.

The tpy emission limitation was developed by multiplying the monthly OC emission limitation (1,216 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 P0110175]

d. Emission Limitation:

Total organic HAP/VOC emissions shall be less than 10.0 tons/yr.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110175]

e. Emission Limitation:

PE shall be less than 10.0 tons/yr.

Applicable Compliance Method:

Compliance with the hourly PE limitation shall be demonstrated by using Method 5 as outlined in 40 CFR Part 60, Appendix A. No testing is specifically required by this permit but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A). Such testing may be required at opacity levels less than those required by the visible emissions limit in section b) of these terms and conditions.

Compliance with the annual PE limitation shall be demonstrated by multiplying the maximum hourly controlled PE rate 0.37 lb/hr (3.7 lbs/hr x (1 – 0.9)) by 8760 hours (total hours in a year) and dividing by 2000 (pounds in a ton).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110175]

f. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0110175]

g) Miscellaneous Requirements

(1) None.

12. Emissions Unit Group - Spincasting units: P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P020, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036 and P037

EU ID	Operations, Property and/or Equipment Description
P004	Spincasting machine 1
P005	Spincasting machine 2
P006	Spincasting machine 3
P007	Spincasting machine 4
P008	Spincasting machine 5
P009	Spincasting machine 6
P010	Spincasting machine 7
P011	Spincasting machine 8
P012	Spincasting machine 9
P013	Spincasting machine 10
P014	Spincasting machine 11
P015	Spincasting machine 12
P016	Spincasting machine 13
P020	Spincasting machine 15
P022	Spincasting machine 16
P023	Spincasting machine 17
P024	Spincasting machine 18
P025	Spincasting machine 19
P026	Spincasting machine 20
P027	Spincasting machine 21
P028	Spincasting machine 22
P029	Spincasting machine 23
P030	Spincasting machine 24
P031	Spincasting machine 25
P032	Spincasting machine 26
P033	Spincasting machine 27
P034	Spincasting machine 28
P035	Spincasting machine 29
P036	Spincasting machine 30
P037	Spincasting machine 31

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.	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 40 CFR 63.5805, Subpart WWWW. See b)(2)a, Table 3 of Subpart WWWW.
b.	40 CFR Part 63.1 – 63.16 (40 CFR 63.5925)	Table 15 to Subpart WWWW – Applicability of General Provisions, Subpart A.
c.	OAC rule 3745-31-05(D) (PTI 02-23000)	Total organic compound (OC) emissions emitted from all resins applied to molds from emissions units P004 – P016, P019 – P020 and P022 – P037, shall not exceed 89.7 tons per year, as a rolling, 12-month summation.
d.	OAC rule 3745-21-25(D)	Volatile organic compounds (VOC) emissions shall not exceed emissions standards as specified in OAC rule 3745-21-25(D)(2). See b(2)b, Table 2 of OAC rule 3745-21-25.

(2) Additional Terms and Conditions

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

40 CFR 63.5805, Subpart WWWW organic HAP emissions less than 100 tons for centrifugal casting only		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.
7. centrifugal casting: CR/HS	a. resin application with the mold closed, and the mold is vented during spinning and cure. b. resin application with the mold closed, and mold is not vented during the spinning and cure. c. resin application with the mold open, and the mold is vented during spinning and cure. d. resin application with the mold open, and the mold is not vented during spinning and cure.	25 lb/ton[4] Not applicable (this is considered to be a closed molding operation) 25 lb/ton[4]

		Use the appropriate open molding emission limit[5]
8. centrifugal casting: non- CR/HS	a. resin application with the mold closed,and the mold is vented during spinning and cure. b. resin application with the mold closed,and mold is not vented during the spinning and cure. c. resin application with the mold open,and the mold is vented duringspinning and cure. d. resin application with the mold open,and the mold is not vented during spinning and cure.	20 lb/ton[4] Not applicable (this is considered to be a closed molding operation) 20 lb/ton[4] Use the appropriate open molding emission limit[5]

[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.

[4]For compliance purposes, calculate your emission factor using only the appropriate centrifugal casting equation in item 2 of Table 1 to 40 CFR 63 Subpart WWWW, or a site-specific emission factor for after the mold is closed as discussed in § 63.5796.

[5]Calculate your emission factor using the appropriate open molding covered cure emission factor in item 1 of Table 1 to 40 CFR Part 63, Subpart WWWW, or a site-specific emission factor as discussed in § 63.5796.

b. 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: shrinkage controlledresins[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.
7. centrifugal casting:CR/HS	a. resin application with the mold closed, and the mold is vented during spinning and cure. b. resin application with the mold closed,and mold is not vented during thespinning and cure. c. resin application with the mold open ,and the mold is vented during spinning and cure. d. resin application with the mold open, and the mold is not vented duringspinning and cure.	25 lb/ton[4] Not applicable (this is considered to be a closed molding operation) 25 lb/ton[4]

		Use the appropriate open molding emission limit[5]
8. centrifugal casting: non- CR/HS	a. resin application with the mold closed,and the mold is vented during spinning and cure. b. resin application with the mold closed,and mold is not vented during thespinning and cure. c. resin application with the mold open,and the mold is vented duringspinning and cure. d. resin application with the mold open,and the mold is not vented duringspinning and cure.	20 lb/ton[4] Not applicable (this is considered to be a closed molding operation) 20 lb/ton[4] Use the appropriate open molding emission limit[5]

[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.

[4]For compliance purposes, calculate the VOC emission factor using only the appropriate centrifugal casting equation in item 2 of Table 1 to 40 CFR 63 Subpart WWWW, or a site-specific emission factor for after the mold is closed as discussed in paragraph (E)(1) of this rule.

[5]Calculate your emission factor using the appropriate open molding covered cure emission factor in item 1 of Table 1 to 40 CFR Part 63, Subpart WWWW, or a site-specific emission factor as discussed in paragraph (E)(1) of this rule.

c) Operational Restrictions

(1) The total OC emissions employed in resins applied to molds from emissions units P004 – P016, P019 – P020 and P022 – P037 shall be restricted so as to not cause OC emissions to exceed 89.7 tons per year, as a rolling, 12-month summation.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-23000]

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 centrifugal casting 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 and centrifugal casting 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 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(G)]

(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)(2)(b)	records of resin and gel coat use, monomer content and operation where it was 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 the following monthly records for each emissions unit:

a. the company identification for each resin applied;

b. pounds of each resin applied; and

c. the weight percent of available OC monomer (styrene and methyl methacrylate) for each resin applied.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-23000]

(8) The permittee shall maintain the following monthly records for emissions units P004 – P016, P019 – P020 and P022 – P037:

a. the total OC emission rate for all resins applied from emissions units P004 – P016, P019 – P020 and P022 – P037 as calculated by the following equation, in tons per year, as a rolling, 12-month summation:

$$\text{OC (ton/12 month rolling avg.)} = 1/2000 \sum_{i}^{n} [(W)(P)]\ i \text{ x EF}$$

where:

W = the weight of each resin applied, as recorded in d)(7)b;
P = the percent of available OC monomer, by weight, of each resin applied, as recorded in d)(7)c;
i = pounds of available OC monomer in each resin, i, applied;
n = number of resins applied; and
EF = each emissions factor.

A site-specific emissions factor was developed by CW Ohio on August 20, 21 and 22, 2007. This site-specific emission factor was established at 0.0211 lb of HAP emissions emitted / lb of available HAP (styrene), (42.2 lb of HAP emissions emitted / ton of available HAP (styrene)), which is equivalent to 0.0211 lb of OC emissions emitted / lb of available OC monomer, (42.2 lbs of OC emissions emitted / tons of available OC monomer)

Note: Available OC monomers include all available OC monomers and available organic HAP monomers in each resin as applied (e.g., styrene, vinyl toluene, methyl methacrylate, and etc.). The product [(W)(P)] is the amount of available OC monomers, in pounds, of each resin applied.

This site-specific emissions factor included emissions generated from the following: resin was applied to an open centrifugal mold using open molding application techniques, and then the mold was closed and the mold was vented during spinning and cure.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-23000]

e) Reporting Requirements

(1) The permittee shall submit semiannual 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	semiannual compliance reports
63.5910(c) – (i) and Table 14	content of semiannual compliance reports
63.5895(d)	list individual resins and gelcoats and application methods in semiannual compliance reports

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

(2) The permittee shall submit semiannual 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)	semiannual 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 semiannual 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 that include the following information:

a. an identification of each month when the total OC emissions exceeded 89.7 tons per year, as a rolling, 12-month summation from emissions units P004 – P016, P019 – P020 and P022 – P037 and the actual OC emissions for each 12-month summation.

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 02-23000]

(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.

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

[Authority for term: OAC rule 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 demonstrated based upon the record keeping requirements specified in d)(4), d)(5) and d)(6) of these terms and conditions.

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

c. Emission Limitation:

Total OC emissions emitted from all resins applied to molds from emissions units P004 – P016, P019 – P020 and P022 – P037 shall not exceed 89.7 tons per year, as a rolling, 12-month summation.

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-23000]

g) Miscellaneous Requirements

(1) None.