State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
ADAMS COUNTY

Street Address:
50 West Town Street, Suite 700
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 07-00572
Fac ID: 0701000067
DATE: 3/13/2007

Premier Vanity Tops LLC
Debbie Hannah
423 Hopewell Rd
Waverly, OH 45690-9700

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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

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

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

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **PCHD**

FINAL PERMIT TO INSTALL 07-00572

Application Number:	07-00572
Facility ID:	0701000067
Permit Fee:	**$1000**
Name of Facility:	Premier Vanity Tops LLC
Person to Contact:	Debbie Hannah
Address:	423 Hopewell Rd Waverly, OH 45690-9700

Location of proposed air contaminant source(s) [emissions unit(s)]:
2564 Moores Rd
Seaman, **Ohio**

Description of proposed emissions unit(s):
Modification to reduces number of presses from 20 to 5 and to increase styrene content.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

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

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

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

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

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

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to

the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

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

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

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

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

4. 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.

5. 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.

6. General Requirements

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

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

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

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

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

7. Fees

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

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

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

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:

i. 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.

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

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

iv. 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:

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

ii. 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.

10. Permit-To-Operate Application

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

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the 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 (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. 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.)

3. 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.

4. Authorization To Install or Modify

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

5. Construction of New Sources(s)

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

6. Public Disclosure

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

7. Applicability

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

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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

C. Permit-To-Install Summary of Allowable Emissions

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
VOC	36.4

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Emissions Unit ID: P002

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P002) - Polyester Resin Compression Molding Unit (Press 2) ; **Modification to allow for an increase in the monomer (styrene) content ; Terms and conditions in this permit supercede those identified in PTI #07-00482 issued 3/22/2000.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-21-07(G)(2)	8 lbs/hr organic compounds (OC) and 40 lbs/day of OC
40 CFR Part 63, Subpart WWWW	See sections A.I.2.a through A.I.2.c below.
ORC 3704.03 (T)(4)	The Best Available Technology (BAT) requirement under OAC rule 3745-31-05(A)(3) does not apply to the OC emissions from this air contaminant source since the uncontrolled potential to emit is less than ten tons per year.

2. Additional Terms and Conditions

2.a As specified in Section 63.5800 and Table 2 of 40 CFR Part 63, Subpart WWWW, the permittee must comply with the requirements of 40 CFR Part 63, Subpart WWWW upon startup of the source. The facility currently operates under the exemption contained in 40 CFR 63.5785(d), which states that the permittee is not subject to the requirements of 40 CFR Part 63, Subpart WWWW if the reinforced plastic composites operations use less than 1.2 tpy of thermoset resins and gel coats that contain styrene, combined. Therefore, the affected source will not be subject to the requirements of 40 CFR Part 63, Subpart WWWW until exceeding the 1.2 tpy usage threshold for thermoset resins and gel coats containing styrene.

2.b If the permittee utilizes thermoset resins and/or gel coats that do not contain styrene, the requirements of 40 CFR Part 63, Subpart WWWW does not apply, per 40 CFR 63.5785(a).

2.c As specified in Section 63.5805, the permittee shall meet the following applicable work practices.

i. For existing closed molding operations using compression molding, the

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

ii. For existing cleaning operations, 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.

iii. For existing HAP-containing materials storage operations, the permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

II. Operational Restrictions

1. The permittee shall employ only resins with a total monomer content of 12% or less.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for each resin and release agent employed in this emissions unit:

   a. the company identification for each material employed;

   b. the total monomer content of each material, in % monomer by weight.

2. If the permittee chooses to comply with the 1.2 tpy usage threshold for thermoset resins containing styrene from emissions units P002 through P006, combined, in order to avoid MACT applicability per 40 CFR 63.5785(d), then the permittee shall maintain records of:

   a. monthly usage of thermoset resins containing styrene; and

   b. rolling, 12-month summation of thermoset resins usage containing styrene used in the press.

3. The permittee shall become subject to the applicable requirements of 40 CFR Part 63, Subpart WWWW upon exceeding the 1.2 tpy usage threshold and shall maintain the records as specified below in order to ensure compliance.

As specified in Section 63.5915, the permittee shall maintain the following records:

a. A copy of each notification and report that was submitted to comply with 40 CFR 63, Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).

b. A certified statement that the permittee is in compliance with the work practice requirements in Table 4 of 40 CFR Part 63, Subpart WWWW, as applicable.

4. As specified in 40 CFR 63.5920, the permittee shall maintain all records as follows:

a. The permittee shall maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1).

b. As specified in 40 CFR 63.10(b)(1), the permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

c. The permittee shall keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). The permittee may keep the records offsite for the remaining 3 years.

5. If the permittee chooses not to comply with the 1.2 tpy usage threshold, then the emissions source shall be subject to the requirements of 40 CFR Part 63, Subpart WWWW upon startup.

IV. Reporting Requirements

1. The permittee shall notify the Portsmouth local air agency in writing of any daily record showing the monomer content of the resin exceeded the 12% limitation of styrene. The notification shall include a copy of such record and shall be sent to the Portsmouth local air agency within 30 days of the deviation.

2. The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

3. As specified in Section 63.5905 and Table 13 of 40 CFR Part 63, Subpart WWWW, and 63.9(b)(2), the permittee shall submit an Initial Notification within 120 calendar days after the source becomes subject to 40 CFR Part 63, Subpart WWWW, which includes the information as specified in 63.9(b)(2)(i)-(v).

4. As specified in Section 63.5910(a), the permittee shall submit each report in Table 14 of 40 CFR Part 63, Subpart WWWW that applies.

   a. Unless the Administrator has approved a different schedule for submission of reports under Section 63.10(a), the permittee shall submit each report by the date specified in Table 14 of 40 CFR Part 63, Subpart WWWW and according to the requirements below:

      i. The first compliance report must cover the period beginning on the compliance date for the affected source and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date specified for the affected source.

      ii. The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for the affected source.

      iii. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December.

      iv. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

      v. For each affected source that is subject to permitting requirements pursuant to 40 CFR Part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of the dates specified above.

   b. The compliance report must contain the information as specified in 40 CFR 63.5910(c), as follows:

      i. company name and address;

      ii. statement by a responsible official with that official's name, title, and

signature;

iii. date of the report and beginning and ending dates of the reporting period; and

iv. if there are no deviations from the requirements for work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW, a statement that there were no deviations from the work practice standards during the reporting period.

c. For each deviation from the requirements for work practices standards that occur at an affected source where the permittee is not using a CMS to comply with the work practice standards, the compliance report must contain the information specified for compliance reports above (b.i - b.iv) and the following, as specified in 40 CFR 63.5910(d):

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

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

d. Each affected source that has obtained a Title V operating permit pursuant to 40 CFR Part 70 or 71 must report all deviations as defined in 40 CFR Part 63, Subpart WWWW in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table14 of 40 CFR Part 63, Subpart WWWW along with, or part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning any deviations from any work practice requirement in 40 CFR Part 63, Subpart WWWW, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submissions of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

8 lbs/hr of OC

Applicable Compliance Method:

The permittee can use up to 3,321 lbs/hr molding compound at the worst-case styrene content (i.e., 12%) in this emissions unit before exceeding the short-term OC limit of 8 lbs/hr (i.e., 3,321 lbs/hr * 0.12 * 0.02 + 0.03 lb/hr OC from mold release = 8 lbs/hr OC). Therefore, compliance with the short-term OC limit shall be assumed since the estimated potential to emit for this emissions unit of 1.66 lbs/hr of OC is well below the limit of 8 lbs/hr.

b. Emission Limitation:

40 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated by calculating the sum of i and ii below:

i. the maximum resin usage rate (16,320 lbs/day) multiplied by the total monomer content of the resin (mass fraction basis), and then multiplied by the emission factor, 0.02 (i.e., 2% of available monomer released from AP-42 Table 4.4-2, dated 9/88); and

ii. multiply the maximum mold release agent usage rate (lb/hr) by the OC content of the mold release agent times 24 hours per day.

VI. Miscellaneous Requirements

None

Issued: 3/13/2007

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P002) - Polyester Resin Compression Molding Unit (Press 2)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Emissions Unit ID: P003

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P003) - Polyester Resin Compression Molding Unit (Press 3) ; **Modification to allow for an increase in the monomer (styrene) content ; Terms and conditions in this permit supercede those identified in PTI #07-00482 issued 3/22/2000.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-21-07(G)(2)	8 lbs/hr organic compounds (OC) and 40 lbs/day of OC
40 CFR Part 63, Subpart WWWW	See sections A.I.2.a through A.I.2.c below.
ORC 3704.03 (T)(4)	The Best Available Technology (BAT) requirement under OAC rule 3745-31-05(A)(3) does not apply to the OC emissions from this air contaminant source since the uncontrolled potential to emit is less than ten tons per year.

2. Additional Terms and Conditions

2.a As specified in Section 63.5800 and Table 2 of 40 CFR Part 63, Subpart WWWW, the permittee must comply with the requirements of 40 CFR Part 63, Subpart WWWW upon startup of the source. The facility currently operates under the exemption contained in 40 CFR 63.5785(d), which states that the permittee is not subject to the requirements of 40 CFR Part 63, Subpart WWWW if the reinforced plastic composites operations use less than 1.2 tpy of thermoset resins and gel coats that contain styrene, combined. Therefore, the affected source will not be subject to the requirements of 40 CFR Part 63, Subpart WWWW until exceeding the 1.2 tpy usage threshold for thermoset resins and gel coats containing styrene.

2.b If the permittee utilizes thermoset resins and/or gel coats that do not contain styrene, the requirements of 40 CFR Part 63, Subpart WWWW does not apply, per 40 CFR 63.5785(a).

2.c As specified in Section 63.5805, the permittee shall meet the following applicable work practices.

i. For existing closed molding operations using compression molding, the permittee shall uncover, unwrap, or expose only one charge per mold

cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.

ii. For existing cleaning operations, 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.

iii. For existing HAP-containing materials storage operations, the permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

II. Operational Restrictions

1. The permittee shall employ only resins with a total monomer content of 12% or less.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for each resin and release agent employed in this emissions unit:

   a. the company identification for each material employed;

   b. the total monomer content of each material, in % monomer by weight.

2. If the permittee chooses to comply with the 1.2 tpy usage threshold for thermoset resins containing styrene from emissions units P002 through P006, combined, in order to avoid MACT applicability per 40 CFR 63.5785(d), then the permittee shall maintain records of:

   a. monthly usage of thermoset resins containing styrene; and

   b. rolling, 12-month summation of thermoset resins usage containing styrene used

in the press.

3. The permittee shall become subject to the applicable requirements of 40 CFR Part 63, Subpart WWWW upon exceeding the 1.2 tpy usage threshold and shall maintain the records as specified below in order to ensure compliance.

As specified in Section 63.5915, the permittee shall maintain the following records:

a. A copy of each notification and report that was submitted to comply with 40 CFR 63, Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).

b. A certified statement that the permittee is in compliance with the work practice requirements in Table 4 of 40 CFR Part 63, Subpart WWWW, as applicable.

4. As specified in 40 CFR 63.5920, the permittee shall maintain all records as follows:

a. The permittee shall maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1).

b. As specified in 40 CFR 63.10(b)(1), the permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

c. The permittee shall keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). The permittee may keep the records offsite for the remaining 3 years.

5. If the permittee chooses not to comply with the 1.2 tpy usage threshold, then the emissions source shall be subject to the requirements of 40 CFR Part 63, Subpart WWWW upon startup.

IV. Reporting Requirements

1. The permittee shall notify the Portsmouth local air agency in writing of any daily record showing the monomer content of the resin exceeded the 12% limitation of styrene. The notification shall include a copy of such record and shall be sent to the Portsmouth local air agency within 30 days of the deviation.

2. The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

3. As specified in Section 63.5905 and Table 13 of 40 CFR Part 63, Subpart WWWW, and 63.9(b)(2), the permittee shall submit an Initial Notification within 120 calendar days after the source becomes subject to 40 CFR Part 63, Subpart WWWW, which includes the information as specified in 63.9(b)(2)(i)-(v).

4. As specified in Section 63.5910(a), the permittee shall submit each report in Table 14 of 40 CFR Part 63, Subpart WWWW that applies.

   a. Unless the Administrator has approved a different schedule for submission of reports under Section 63.10(a), the permittee shall submit each report by the date specified in Table 14 of 40 CFR Part 63, Subpart WWWW and according to the requirements below:

      i. The first compliance report must cover the period beginning on the compliance date for the affected source and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date specified for the affected source.

      ii. The first compliance report must be postmarked or delivered no later than July
      31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for the affected source.

      iii. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December.

      iv. Each subsequent compliance report must be postmarked or delivered no later
      than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

      v. For each affected source that is subject to permitting requirements pursuant
      to 40 CFR Part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of the dates specified above.

   b. The compliance report must contain the information as specified in 40 CFR

63.5910(c), as follows:

i. company name and address;

ii. statement by a responsible official with that official's name, title, and signature;

iii. date of the report and beginning and ending dates of the reporting period; and

iv. if there are no deviations from the requirements for work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW, a statement that there were no deviations from the work practice standards during the reporting period.

c. For each deviation from the requirements for work practices standards that occur at an affected source where the permittee is not using a CMS to comply with the work practice standards, the compliance report must contain the information specified for compliance reports above (b.i - b.iv) and the following, as specified in 40 CFR 63.5910(d):

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

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

d. Each affected source that has obtained a Title V operating permit pursuant to 40 CFR Part 70 or 71 must report all deviations as defined in 40 CFR Part 63, Subpart WWWW in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table14 of 40 CFR Part 63, Subpart WWWW along with, or part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning any deviations from any work practice requirement in 40 CFR Part 63, Subpart WWWW, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submissions of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:

      8 lbs/hr of OC

      Applicable Compliance Method:

      The permittee can use up to 3,321 lbs/hr molding compound at the worst-case styrene content (i.e., 12%) in this emissions unit before exceeding the short-term OC limit of 8 lbs/hr (i.e., 3,321 lbs/hr * 0.12 * 0.02 + 0.03 lb/hr OC from mold release = 8 lbs/hr OC). Therefore, compliance with the short-term OC limit shall be assumed since the estimated potential to emit for this emissions unit of 1.66 lbs/hr of OC is well below the limit of 8 lbs/hr.

   b. Emission Limitation:

      40 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated by calculating the sum of i and ii below:

i. the maximum resin usage rate (16,320 lbs/day) multiplied by the total monomer content of the resin (mass fraction basis), and then multiplied by the emission factor, 0.02 (i.e., 2% of available monomer released from AP-42 Table 4.4-2, dated 9/88); and

ii. multiply the maximum mold release agent usage rate (lb/hr) by the OC content of the mold release agent times 24 hours per day.

VI. Miscellaneous Requirements

None

Emissions Unit ID: P003

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P003) - Polyester Resin Compression Molding Unit (Press 3)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 3/13/2007

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P004) - Polyester Resin Compression Molding Unit (Press 4) ; **Modification to allow for an increase in the monomer (styrene) content ; Terms and conditions in this permit supercede those identified in PTI #07-00482 issued 3/22/2000.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-21-07(G)(2)	8 lbs/hr organic compounds (OC) and 40 lbs/day of OC
40 CFR Part 63, Subpart WWWW	See sections A.I.2.a through A.I.2.c below.
ORC 3704.03 (T)(4)	The Best Available Technology (BAT) requirement under OAC rule 3745-31-05(A)(3) does not apply to the OC emissions from this air contaminant source since the uncontrolled potential to emit is less than ten tons per year.

2. Additional Terms and Conditions

2.a As specified in Section 63.5800 and Table 2 of 40 CFR Part 63, Subpart WWWW, the permittee must comply with the requirements of 40 CFR Part 63, Subpart WWWW upon startup of the source. The facility currently operates under the exemption contained in 40 CFR 63.5785(d), which states that the permittee is not subject to the requirements of 40 CFR Part 63, Subpart WWWW if the reinforced plastic composites operations use less than 1.2 tpy of thermoset resins and gel coats that contain styrene, combined. Therefore, the affected source will not be subject to the requirements of 40 CFR Part 63, Subpart WWWW until exceeding the 1.2 tpy usage threshold for thermoset resins and gel coats containing styrene.

2.b If the permittee utilizes thermoset resins and/or gel coats that do not contain styrene, the requirements of 40 CFR Part 63, Subpart WWWW does not apply, per 40 CFR 63.5785(a).

2.c As specified in Section 63.5805, the permittee shall meet the following applicable work practices.

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

ii. For existing cleaning operations, 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.

iii. For existing HAP-containing materials storage operations, the permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

II. Operational Restrictions

1. The permittee shall employ only resins with a total monomer content of 12% or less.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for each resin and release agent employed in this emissions unit:

   a. the company identification for each material employed;

   b. the total monomer content of each material, in % monomer by weight.

2. If the permittee chooses to comply with the 1.2 tpy usage threshold for thermoset resins containing styrene from emissions units P002 through P006, combined, in order to avoid MACT applicability per 40 CFR 63.5785(d), then the permittee shall maintain

records of:

a. monthly usage of thermoset resins containing styrene; and

b. rolling, 12-month summation of thermoset resins usage containing styrene used in the press.

3. The permittee shall become subject to the applicable requirements of 40 CFR Part 63, Subpart WWWW upon exceeding the 1.2 tpy usage threshold and shall maintain the records as specified below in order to ensure compliance.

As specified in Section 63.5915, the permittee shall maintain the following records:

a. A copy of each notification and report that was submitted to comply with 40 CFR 63, Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).

b. A certified statement that the permittee is in compliance with the work practice requirements in Table 4 of 40 CFR Part 63, Subpart WWWW, as applicable.

4. As specified in 40 CFR 63.5920, the permittee shall maintain all records as follows:

a. The permittee shall maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1).

b. As specified in 40 CFR 63.10(b)(1), the permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

c. The permittee shall keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). The permittee may keep the records offsite for the remaining 3 years.

5. If the permittee chooses not to comply with the 1.2 tpy usage threshold, then the emissions source shall be subject to the requirements of 40 CFR Part 63, Subpart WWWW upon startup.

IV. Reporting Requirements

1. The permittee shall notify the Portsmouth local air agency in writing of any daily record showing the monomer content of the resin exceeded the 12% limitation of styrene. The notification shall include a copy of such record and shall be sent to the Portsmouth local air agency within 30 days of the deviation.

2. The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

3. As specified in Section 63.5905 and Table 13 of 40 CFR Part 63, Subpart WWWW, and 63.9(b)(2), the permittee shall submit an Initial Notification within 120 calendar days after the source becomes subject to 40 CFR Part 63, Subpart WWWW, which includes the information as specified in 63.9(b)(2)(i)-(v).

4. As specified in Section 63.5910(a), the permittee shall submit each report in Table 14 of 40 CFR Part 63, Subpart WWWW that applies.

   a. Unless the Administrator has approved a different schedule for submission of reports under Section 63.10(a), the permittee shall submit each report by the date specified in Table 14 of 40 CFR Part 63, Subpart WWWW and according to the requirements below:

      i. The first compliance report must cover the period beginning on the compliance date for the affected source and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date specified for the affected source.

      ii. The first compliance report must be postmarked or delivered no later than July
      31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for the affected source.

      iii. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December.

      iv. Each subsequent compliance report must be postmarked or delivered no later
      than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

      v. For each affected source that is subject to permitting requirements pursuant
      to 40 CFR Part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the permittee may submit

the first and subsequent compliance reports according to the dates the permitting authority has established instead of the dates specified above.

b. The compliance report must contain the information as specified in 40 CFR 63.5910(c), as follows:

i. company name and address;

ii. statement by a responsible official with that official's name, title, and signature;

iii. date of the report and beginning and ending dates of the reporting period; and

iv. if there are no deviations from the requirements for work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW, a statement that there were no deviations from the work practice standards during the reporting period.

c. For each deviation from the requirements for work practices standards that occur at an affected source where the permittee is not using a CMS to comply with the work practice standards, the compliance report must contain the information specified for compliance reports above (b.i - b.iv) and the following, as specified in 40 CFR 63.5910(d):

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

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

d. Each affected source that has obtained a Title V operating permit pursuant to 40 CFR Part 70 or 71 must report all deviations as defined in 40 CFR Part 63, Subpart WWWW in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table14 of 40 CFR Part 63, Subpart WWWW along with, or part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning any deviations from any work practice requirement in 40 CFR Part 63, Subpart WWWW, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submissions of a compliance report shall not otherwise affect any obligation the affected source may have to report

deviations from permit requirements to the permitting authority.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:

      8 lbs/hr of OC

      Applicable Compliance Method:

      The permittee can use up to 3,321 lbs/hr molding compound at the worst-case styrene content (i.e., 12%) in this emissions unit before exceeding the short-term OC limit of 8 lbs/hr (i.e., 3,321 lbs/hr * 0.12 * 0.02 + 0.03 lb/hr OC from mold release = 8 lbs/hr OC). Therefore, compliance with the short-term OC limit shall be assumed since the estimated potential to emit for this emissions unit of 1.66 lbs/hr of OC is well below the limit of 8 lbs/hr.

   b. Emission Limitation:

      40 lbs/day of OC

      Applicable Compliance Method:

      Compliance shall be demonstrated by calculating the sum of i and ii below:

      i. the maximum resin usage rate (16,320 lbs/day) multiplied by the total monomer content of the resin (mass fraction basis), and then multiplied by the emission factor, 0.02 (i.e., 2% of available monomer released from AP-42 Table 4.4-2, dated 9/88); and

      ii. multiply the maximum mold release agent usage rate (lb/hr) by the OC content of the mold release agent times 24 hours per day.

VI. Miscellaneous Requirements

None

Emissions Unit ID: P004

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P004) - Polyester Resin Compression Molding Unit (Press 4)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 3/13/2007

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P005) - Polyester Resin Compression Molding Unit (Press 5) ; **Modification to allow for an increase in the monomer (styrene) content ; Terms and conditions in this permit supercede those identified in PTI #07-00482 issued 3/22/2000.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-21-07(G)(2)	8 lbs/hr organic compounds (OC) and 40 lbs/day of OC
40 CFR Part 63, Subpart WWWW	See sections A.I.2.a through A.I.2.c below.
ORC 3704.03 (T)(4)	The Best Available Technology (BAT) requirement under OAC rule 3745-31-05(A)(3) does not apply to the OC emissions from this air contaminant source since the uncontrolled potential to emit is less than ten tons per year.

2. Additional Terms and Conditions

2.a As specified in Section 63.5800 and Table 2 of 40 CFR Part 63, Subpart WWWW, the permittee must comply with the requirements of 40 CFR Part 63, Subpart WWWW upon startup of the source. The facility currently operates under the exemption contained in 40 CFR 63.5785(d), which states that the permittee is not subject to the requirements of 40 CFR Part 63, Subpart WWWW if the reinforced plastic composites operations use less than 1.2 tpy of thermoset resins and gel coats that contain styrene, combined. Therefore, the affected source will not be subject to the requirements of 40 CFR Part 63, Subpart WWWW until exceeding the 1.2 tpy usage threshold for thermoset resins and gel coats containing styrene.

2.b If the permittee utilizes thermoset resins and/or gel coats that do not contain styrene, the requirements of 40 CFR Part 63, Subpart WWWW does not apply, per 40 CFR 63.5785(a).

2.c As specified in Section 63.5805, the permittee shall meet the following applicable work practices.

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

ii. For existing cleaning operations, 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.

iii. For existing HAP-containing materials storage operations, the permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

II. Operational Restrictions

1. The permittee shall employ only resins with a total monomer content of 12% or less.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for each resin and release agent employed in this emissions unit:

   a. the company identification for each material employed;

   b. the total monomer content of each material, in % monomer by weight.

2. If the permittee chooses to comply with the 1.2 tpy usage threshold for thermoset resins containing styrene from emissions units P002 through P006, combined, in order to avoid MACT applicability per 40 CFR 63.5785(d), then the permittee shall maintain

records of:

a. monthly usage of thermoset resins containing styrene; and

b. rolling, 12-month summation of thermoset resins usage containing styrene used in the press.

3. The permittee shall become subject to the applicable requirements of 40 CFR Part 63, Subpart WWWW upon exceeding the 1.2 tpy usage threshold and shall maintain the records as specified below in order to ensure compliance.

As specified in Section 63.5915, the permittee shall maintain the following records:

a. A copy of each notification and report that was submitted to comply with 40 CFR 63, Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).

b. A certified statement that the permittee is in compliance with the work practice requirements in Table 4 of 40 CFR Part 63, Subpart WWWW, as applicable.

4. As specified in 40 CFR 63.5920, the permittee shall maintain all records as follows:

a. The permittee shall maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1).

b. As specified in 40 CFR 63.10(b)(1), the permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

c. The permittee shall keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). The permittee may keep the records offsite for the remaining 3 years.

5. If the permittee chooses not to comply with the 1.2 tpy usage threshold, then the emissions source shall be subject to the requirements of 40 CFR Part 63, Subpart WWWW upon startup.

IV. Reporting Requirements

1. The permittee shall notify the Portsmouth local air agency in writing of any daily record showing the monomer content of the resin exceeded the 12% limitation of styrene. The notification shall include a copy of such record and shall be sent to the Portsmouth local air agency within 30 days of the deviation.

2. The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

3. As specified in Section 63.5905 and Table 13 of 40 CFR Part 63, Subpart WWWW, and 63.9(b)(2), the permittee shall submit an Initial Notification within 120 calendar days after the source becomes subject to 40 CFR Part 63, Subpart WWWW, which includes the information as specified in 63.9(b)(2)(i)-(v).

4. As specified in Section 63.5910(a), the permittee shall submit each report in Table 14 of 40 CFR Part 63, Subpart WWWW that applies.

   a. Unless the Administrator has approved a different schedule for submission of reports under Section 63.10(a), the permittee shall submit each report by the date specified in Table 14 of 40 CFR Part 63, Subpart WWWW and according to the requirements below:

      i. The first compliance report must cover the period beginning on the compliance date for the affected source and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date specified for the affected source.

      ii. The first compliance report must be postmarked or delivered no later than July
      31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for the affected source.

      iii. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December.

      iv. Each subsequent compliance report must be postmarked or delivered no later
      than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

      v. For each affected source that is subject to permitting requirements pursuant
      to 40 CFR Part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of the dates specified above.

   b. The compliance report must contain the information as specified in 40 CFR

63.5910(c), as follows:

i. company name and address;

ii. statement by a responsible official with that official's name, title, and signature;

iii. date of the report and beginning and ending dates of the reporting period; and

iv. if there are no deviations from the requirements for work practice standards
in Table 4 of 40 CFR Part 63, Subpart WWWW, a statement that there were no deviations from the work practice standards during the reporting period.

c. For each deviation from the requirements for work practices standards that occur at an affected source where the permittee is not using a CMS to comply with the work practice standards, the compliance report must contain the information specified for compliance reports above (b.i - b.iv) and the following, as specified in 40 CFR 63.5910(d):

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

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

d. Each affected source that has obtained a Title V operating permit pursuant to 40 CFR Part 70 or 71 must report all deviations as defined in 40 CFR Part 63, Subpart WWWW in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table14 of 40 CFR Part 63, Subpart WWWW along with, or part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning any deviations from any work practice requirement in 40 CFR Part 63, Subpart WWWW, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submissions of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:

      8 lbs/hr of OC

      Applicable Compliance Method:

      The permittee can use up to 3,321 lbs/hr molding compound at the worst-case styrene content (i.e., 12%) in this emissions unit before exceeding the short-term OC limit of 8 lbs/hr (i.e., 3,321 lbs/hr * 0.12 * 0.02 + 0.03 lb/hr OC from mold release = 8 lbs/hr OC). Therefore, compliance with the short-term OC limit shall be assumed since the estimated potential to emit for this emissions unit of 1.66 lbs/hr of OC is well below the limit of 8 lbs/hr.

   b. Emission Limitation:

      40 lbs/day of OC

Emissions Unit ID: P005

Applicable Compliance Method:

Compliance shall be demonstrated by calculating the sum of i and ii below:

i. the maximum resin usage rate (16,320 lbs/day) multiplied by the total monomer content of the resin (mass fraction basis), and then multiplied by the emission factor, 0.02 (i.e., 2% of available monomer released from AP-42 Table 4.4-2, dated 9/88); and

ii. multiply the maximum mold release agent usage rate (lb/hr) by the OC content of the mold release agent times 24 hours per day.

VI. Miscellaneous Requirements

None

Issued: 3/13/2007

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P005) - Polyester Resin Compression Molding Unit (Press 5)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 3/13/2007

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P006) - Polyester Resin Compression Molding Unit (Press 6) ; **Modification to allow for an increase in the monomer (styrene) content ; Terms and conditions in this permit supercede those identified in PTI #07-00482 issued 3/22/2000.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-21-07(G)(2)	8 lbs/hr organic compounds (OC) and 40 lbs/day of OC
40 CFR Part 63, Subpart	See sections A.I.2.a through A.I.2.c below.
ORC 3704.03 (T)(4)	The Best Available Technology (BAT) requirement under OAC rule 3745-31-05(A)(3) does not apply to the OC emissions from this air contaminant source since the uncontrolled potential to emit is less than ten tons per year.

2. Additional Terms and Conditions

2.a As specified in Section 63.5800 and Table 2 of 40 CFR Part 63, Subpart WWWW, the permittee must comply with the requirements of 40 CFR Part 63, Subpart WWWW upon startup of the source. The facility currently operates under the exemption contained in 40 CFR 63.5785(d), which states that the permittee is not subject to the requirements of 40 CFR Part 63, Subpart WWWW if the reinforced plastic composites operations use less than 1.2 tpy of thermoset resins and gel coats that contain styrene, combined. Therefore, the affected source will not be subject to the requirements of 40 CFR Part 63, Subpart WWWW until exceeding the 1.2 tpy usage threshold for thermoset resins and gel coats containing styrene.

2.b If the permittee utilizes thermoset resins and/or gel coats that do not contain styrene, the requirements of 40 CFR Part 63, Subpart WWWW does not apply, per 40 CFR 63.5785(a).

2.c As specified in Section 63.5805, the permittee shall meet the following

applicable work practices.

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

ii. For existing cleaning operations, 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.

iii. For existing HAP-containing materials storage operations, the permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

II. Operational Restrictions

1. The permittee shall employ only resins with a total monomer content of 12% or less.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for each resin and release agent employed in this emissions unit:

   a. the company identification for each material employed;

   b. the total monomer content of each material, in % monomer by weight.

2. If the permittee chooses to comply with the 1.2 tpy usage threshold for thermoset resins containing styrene from emissions units P002 through P006, combined, in order to avoid MACT applicability per 40 CFR 63.5785(d), then the permittee shall maintain records of:

a. monthly usage of thermoset resins containing styrene; and

b. rolling, 12-month summation of thermoset resins usage containing styrene used in the press.

3. The permittee shall become subject to the applicable requirements of 40 CFR Part 63, Subpart WWWW upon exceeding the 1.2 tpy usage threshold and shall maintain the records as specified below in order to ensure compliance.

   As specified in Section 63.5915, the permittee shall maintain the following records:

   a. A copy of each notification and report that was submitted to comply with 40 CFR 63, Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).

   b. A certified statement that the permittee is in compliance with the work practice requirements in Table 4 of 40 CFR Part 63, Subpart WWWW, as applicable.

4. As specified in 40 CFR 63.5920, the permittee shall maintain all records as follows:

   a. The permittee shall maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1).

   b. As specified in 40 CFR 63.10(b)(1), the permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

   c. The permittee shall keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). The permittee may keep the records offsite for the remaining 3 years.

5. If the permittee chooses not to comply with the 1.2 tpy usage threshold, then the emissions source shall be subject to the requirements of 40 CFR Part 63, Subpart WWWW upon startup.

IV. Reporting Requirements

1. The permittee shall notify the Portsmouth local air agency in writing of any daily record showing the monomer content of the resin exceeded the 12% limitation of styrene. The notification shall include a copy of such record and shall be sent to the Portsmouth local air agency within 30 days of the deviation.

2. The reports contained in this permit shall be submitted in accordance with the reporting

requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

3. As specified in Section 63.5905 and Table 13 of 40 CFR Part 63, Subpart WWWW, and 63.9(b)(2), the permittee shall submit an Initial Notification within 120 calendar days after the source becomes subject to 40 CFR Part 63, Subpart WWWW, which includes the information as specified in 63.9(b)(2)(i)-(v).

4. As specified in Section 63.5910(a), the permittee shall submit each report in Table 14 of 40 CFR Part 63, Subpart WWWW that applies.

   a. Unless the Administrator has approved a different schedule for submission of reports under Section 63.10(a), the permittee shall submit each report by the date specified in Table 14 of 40 CFR Part 63, Subpart WWWW and according to the requirements below:

      i. The first compliance report must cover the period beginning on the compliance date for the affected source and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date specified for the affected source.

      ii. The first compliance report must be postmarked or delivered no later than July
      31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for the affected source.

      iii. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December.

      iv. Each subsequent compliance report must be postmarked or delivered no later
      than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

      v. For each affected source that is subject to permitting requirements pursuant
      to 40 CFR Part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the permittee may submit the first and subsequent compliance reports according to the dates the

permitting authority has established instead of the dates specified above.

b. The compliance report must contain the information as specified in 40 CFR 63.5910(c), as follows:

i. company name and address;

ii. statement by a responsible official with that official's name, title, and signature;

iii. date of the report and beginning and ending dates of the reporting period; and

iv. if there are no deviations from the requirements for work practice standards
in Table 4 of 40 CFR Part 63, Subpart WWWW, a statement that there were no deviations from the work practice standards during the reporting period.

c. For each deviation from the requirements for work practices standards that occur at an affected source where the permittee is not using a CMS to comply with the work practice standards, the compliance report must contain the information specified for compliance reports above (b.i - b.iv) and the following, as specified in 40 CFR 63.5910(d):

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

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

d. Each affected source that has obtained a Title V operating permit pursuant to 40 CFR Part 70 or 71 must report all deviations as defined in 40 CFR Part 63, Subpart WWWW in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table14 of 40 CFR Part 63, Subpart WWWW along with, or part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning any deviations from any work practice requirement in 40 CFR Part 63, Subpart WWWW, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submissions of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

8 lbs/hr of OC

Applicable Compliance Method:

The permittee can use up to 3,321 lbs/hr molding compound at the worst-case styrene content (i.e., 12%) in this emissions unit before exceeding the short-term OC limit of 8 lbs/hr (i.e., 3,321 lbs/hr * 0.12 * 0.02 + 0.03 lb/hr OC from mold release = 8 lbs/hr OC). Therefore, compliance with the short-term OC limit shall be assumed since the estimated potential to emit for this emissions unit of 1.66 lbs/hr of OC is well below the limit of 8 lbs/hr.

Emissions Unit ID: P006

b. Emission Limitation:

40 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated by calculating the sum of i and ii below:

i. the maximum resin usage rate (16,320 lbs/day) multiplied by the total monomer content of the resin (mass fraction basis), and then multiplied by the emission factor, 0.02 (i.e., 2% of available monomer released from AP-42 Table 4.4-2, dated 9/88); and

ii. multiply the maximum mold release agent usage rate (lb/hr) by the OC content of the mold release agent times 24 hours per day.

VI. Miscellaneous Requirements

None

Issued: 3/13/2007

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P006) - Polyester Resin Compression Molding Unit (Press 6)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None