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

3/18/2013

Certified Mail

Mr. George Frahn
Comfort Line Ltd.
5500 Enterprise Blvd
Toledo, OH 43216

Facility ID: 0448011664
Permit Number: P0108553
County: Lucas

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Significant Permit Modification

Dear Permit Holder:

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

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

and

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
TDES; Michigan; Indiana

PUBLIC NOTICE
3/18/2013 Issuance of Draft Air Pollution Title V Permit

Comfort Line Ltd.
5500 Enterprise Blvd,
Toledo, OH 43612
Lucas County
FACILITY DESC.: All Other Plastics Product Manufacturing
PERMIT #: P0108553
PERMIT TYPE: Significant Permit Modification
PERMIT DESC: Title V Significant Permit Modification to incorporate a Chapter 31 modification of K001 and K002 to increase allowable VOC due to a change in coatings. This also takes into consideration the recent revisions to OAC rule 3745-21-07 and applicability of OAC rule 3745-21-25.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Babak Firoozi, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604. Ph: (419)936-3015

Statement of Basis For Air Pollution Title V Permit

Facility ID:	0448011664
Facility Name:	Comfort Line Ltd.
Facility Description:	Manufacture of extruded plastics
Facility Address:	5500 Enterprise Blvd, Toledo, OH 43612
Permit #:	P0108553, Significant Permit Modification

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

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

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	no
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	P001 (P0109082) - Administrative modification to BAT for non-volatile organic emissions in consideration of the recent revisions to OAC rule 3745-21-07 and applicability of OAC rule 3745-21-25. P002 – P006 (P0110677) - Administrative modification to BAT for non-volatile organic emissions in consideration of the recent revisions to OAC rule 3745-21-07 and applicability of OAC rule 3745-21-25.
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	K001, K002, P014 (P0110554) - A Chapter 31 Modification to increased allowable VOC due to a change in coatings. This modification also updated terms to remove defunct OAC rule 3745-21-07 and add OAC rule 3745-21-25.

Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	N/A

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.2 - B.7	N	Y	OAC rule 3745-31-05(D) facility-wide VOC restriction of 90 tons per rolling 12- month period to avoid additional nonattainment new source review requirements, federally enforceable facility-wide emission limitations were originally established for VOC in PTI 04-01457, issued December 5, 2006. Applicable monthly record keeping and exceedance reporting were included to ensure compliance. Current terms and conditions per P0110677 issued on 11/21/2012.
B.8	N	Y	Applicability of 40 CFR Part 63 Subpart A and Subpart PPPP for K001 and K002.
B.9	N	Y	Applicability of 40 CFR Part 63 Subparts A and WWWW for P001, P002, P003, P004, P005 and P006.
B.10	N	Y	Insignificant emission units: B001, F001 – F003, T001, Z004, Z006, and Z007.

C. Emissions Unit Terms and Conditions

Key:
EU = emissions unit ID
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not
R = record keeping requirements
Rp = reporting requirements

applicable to a specific emissions unit)
OR = operational restriction
M = monitoring requirements
ENF = did noncompliance issues drive the monitoring requirements?
ET = emission testing requirements (not including compliance method terms)
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
Misc = miscellaneous requirements

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
K001: Coating line for fiberglass reinforced pultruded styrene resin	79.5 tons VOC/yr from coatings employed	N	Y	N	N	N	N	N	N	N	N	N	Basis - ORC 3704.03(T) established by P0110554, as issued on September 24, 2012,. This emission limitation reflects the implementation of MACT-compliant coatings and operating restrictions. Note: the 2009 BAT included restrictions on clean-up materials based on the requirements ot OAC rule 3745-21-07(G). This rule was extensively modified, eliminating the SIP based requirement for tracking of clean-up materials. There is no requirement to set a restriction for clean-up solvent related emissions under OAC rule 3745-31-05 as the VOC emitted from coatings is greater (i.e., the coating restriction represents the worst case rate of VOC emissions for PTE purposes) M, R &Rp - VOC emissions reflect PTE for this emissions unit. Therefore, no tracking for this emissions unit required. Facility-wide restriction in B.2 of 90 tons per rolling, 12-month for VOC tracked by material usage and VOC content. ET - This emissions unit has never been stack tested because M,R,Rp is used to demonstrate compliance of facility-wide VOC emissions. Coating usage and VOC content record-keeping establish compliance. No additional stack testing required.
	Particulate emissions (PE) from the stack serving this emissions unit shall	N	Y	N	Y	Y	N	Y	Y	N	N	N	Basis - OAC rule 3745-31-05(A)(3), as effective 11/30/01. 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

not exceed 0.23 pound per hour and 1.01 tons per year.												approves the December 1, 2006 version of 3745-31-05, then these emission limits will no longer apply. OR – operation of a particulate filter M,R,Rp,ET –emissions are PTE while complying with OAC rule 3745-17-11(C), i.e., while operating a particulate filter.
B.A.T. does not apply for particulate emissions because the potential to emit PE <10 tpy	N	Y	Y	N	N	N	N	N	N	N	N	Basis: ND - OAC rule 3745-31-05(A)(3)(a)(ii): S.B. 265, enacted August 3, 2006, exempts sources with certain qualifying criteria from B.A.T. if the qualifying criteria are met and the sources does not have the potential to emit more than 10 tpy of a pollutant. Because this source meets the qualifying criteria and the calculated annual emission rate for particulate emissions is less than 10 tpy, B.A.T. does not apply to particulate emission. M,R,Rp,ET – none required as emissions are <10 tpy PTE while complying with OAC rule 3745-17-11(C), i.e., while operating a particulate filter.
20 percent opacity, as a 6-minute average, from the stack	17-07(A)(1)	N	N	Y	Y	N	Y	Y	N	N	N	OR - particulate collection system is required in compliance with OAC rule 3745-17-11(C) M, R, Rp - work practice standards per OAC rule3745-17-11(C) and tracking non-usage of particulate filtration system is deemed adequate for M, R, Rp ET - Method 9; This emissions unit has never been stack tested because anticipated emissions are so low. If M,R,Rp indicates emissions, stack testing by Method 9 will be required to demonstrate compliance.
the work practice requirements of OAC rule 3745-17-11(C)(2)(a) through (g)	17-11 (C)(1) and (C)(2)	N	N	Y	Y	N	Y	Y	N	N	N	Basis – these requirements replace the applicability of OAC rule 3745-17-11(B)(1) as it previously applied to this source. OR - particulate collection system is required in compliance with OAC rule 3745-17-11(C) M, R, Rp – per OEPA library T&Cs

	Applicability of OAC rule 3745-21-07(G)	21-07 (G)(9)(f)	N	Y	N	N	N	N	N	N	N	N	ND- no longer a SIP requirement.
	0.16 lb organic HAPs emissions/lb coating solids applied during each 12-month compliance period	N	Y	N	Y	Y	N	Y	Y	N	N	N	Basis – 40 CFR Part 63 Subparts A and PPPP. This emission limitation reflects the implementation of MACT-compliant coatings and operating restrictions as specified in 40 CFR Part 63, Subpart PPPP and applicable portions of 40 CFR Part 63, Subpart A. OR, M, R, &Rp – following of record keeping and reporting requirements of MACT will verify compliance ET - testing is based on the methods set forth in 40 CFR Part 63, Subpart PPPP under the "compliant coatings" or "emission rate without add-on controls" options, as appropriate. No controls. Stack testing is not required.
K002: Coating line for fiberglass reinforced pultruded styrene resin	20 percent opacity, as a 6-minute average, from the stack	17-07(A)(1)	N	N	Y	Y	N	Y	Y	N	N	N	OR - particulate collection system is required in compliance with OAC rule 3745-17-11(C) M, R, Rp – work practice standards per OAC rule3745-17-11(C) and tracking non-usage of particulate filtration system is deemed adequate for M, R, Rp ET - Method 9; This emissions unit has never been stack tested because anticipated emissions are so low. If M,R,Rp indicates emissions, stack testing by Method 9 will be required to demonstrate compliance.
	the work practice requirements of OAC rule 3745-17-11(C)(2)(a) through (g)	17-11 (C)(1) and (C)(2)	N	N	Y	Y	N	Y	Y	N	N	N	Basis – these requirements replace the applicability of OAC rule 3745-17-11(B)(1) as it previously applied to this source. OR - particulate collection system is required in compliance with OAC rule 3745-17-11(C) M, R, Rp – per OEPA library T&Cs
	Particulate emissions (PE) from the stack	N	Y	N	Y	Y	N	Y	Y	N	N	N	Basis - OAC rule 3745-31-05(A)(3), as effective 11/30/01. Until the SIP revision occurs and the U.S.

serving this emissions unit shall not exceed 0.05 pound per hour and 0.22 ton per rolling, 12-month period.												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 limits will no longer apply. OR – operating a particulate filter M,R,Rp,ET – none required as emissions are PTE while complying with OAC rule 3745-17-11(C), i.e., while operating a particulate filter.
The emissions of volatile organic compounds (VOC) from the coatings as employed in this emissions unit shall not exceed 15.90 tons per rolling, 12-month period.	N	Y	N	N	N	N	N	N	N	N	N	Basis - ORC 3704.03(T) established by P0110554, as issued on September 24, 2012. This emission limitation reflects the implementation of MACT-compliant coatings and operating restrictions. Note: the 2009 BAT included restrictions on clean-up materials based on the requirements of OAC rule 3745-21-07(G). This rule was extensively modified, eliminating the SIP based requirement for tracking of clean-up materials. There is no requirement to set a restriction for clean-up solvent related emissions under OAC rule 3745-31-05 as the VOC emitted from coatings is greater (i.e., the coating restriction represents the worst case rate of VOC emissions for PTE purposes) M, R &Rp - VOC emissions reflect PTE for this emissions unit. Therefore, no tracking for this emissions unit required. Facility-wide restriction in B.2 of 90 tons per rolling, 12-month for VOC tracked by material usage and VOC content. ET - This emissions unit has never been stack tested because M,R,Rp is used to demonstrate compliance of facility-wide VOC emissions. Coating usage and VOC content record-keeping establish compliance. No additional stack testing required.
B.A.T. does not apply for uncontrolled	N	Y	Y	N	N	N	N	N	N	N	N	Basis, ND - OAC rule 3745-31-05(A)(3)(a)(ii): S.B. 265, enacted August 3, 2006, exempts sources with

	particulate emissions because the potential to emit PE <10 tpy												certain qualifying criteria from B.A.T. if the qualifying criteria are met and the sources does not have the potential to emit more than 10 tpy of a pollutant. Because this source meets the qualifying criteria and the calculated annual emission rate for particulate emissions is less than 10 tpy, B.A.T. does not apply particulate emissions. M, R, Rp, ET is not required
	0.16 lb organic HAPs emissions/lb coating solids applied during each 12-month compliance period	N	Y	N	Y	Y	N	Y	Y	N	N	N	Basis – 40 CFR Part 63 Subpart A and PPPP. This emission limitation reflects the implementation of MACT-compliant coatings and operating restrictions as specified in 40 CFR Part 63, Subpart PPPP and applicable portions of 40 CFR Part 63, Subpart A. OR, M, R, &Rp - following of record keeping and reporting requirements of MACT will verify compliance ET - testing is based on the methods set forth in 40 CFR Part 63, Subpart PPPP under the “compliant coatings” or “emission rate without add-on controls” options, as appropriate. No controls. Stack testing is not required.
	Applicability of OAC rule 3745-21-07(G)	21-07(G)(2)	N	Y	N	N	N	N	N	N	N	N	ND – OAC rule 3745-21-07(G) has been removed from the SIP.
P001: Resin Blending Mixer 1	1.88lbs volatile organic compound emissions/hr;	N	Y	N	N	N	N	N	N	N	N	N	Basis - OAC rule 3745-31-05(A)(3) established by PTI 04-01457, as issued on December 5, 2006. The paste contains a styrene monomer. The emission factor for styrene (0.010 lb styrene/lb paste) was previously based on AP-42 for paint mixing. A more specific emission factor based on the test of a MACT-compliant cover determined from results of a U.S. EPA Method 204 – compliant temporary total enclosure conducted on 9/30/2004 at Continental Structural Plastics of Ohio, 0204020245. The new emission factor for styrene (0.005 lb styrene/lb paste) was determined based on this test. M, R &Rp – VOC emissions based on PTE along with

													work practice standards of OAC rule 3745-21-25 ET - No stack testing required. If necessary, 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, and/or 40 CFR Part 51, Appendix M, Methods 204 A through F as appropriate, will be used to demonstrate compliance.
	Particulate emissions (PE) shall not exceed 0.07 pound per hour and 0.31 ton per rolling, 12-month period.	N	Y	N	Y	Y	N	Y	Y	N	N	N	Basis - OAC rule 3745-31-05(A)(3), as effective 11/30/01. 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 limits will no longer apply. M,R,Rp,ET – compliance demonstrated by use of a particulate filter and VE checks.
	B.A.T. does not apply for uncontrolled particulate emissions because the potential to emit PE <10 tpy	N	Y	Y	N	N	N	N	N	N	N	N	Basis - OAC rule 3745-31-05(A)(3)(a)(ii): S.B. 265, enacted August 3, 2006, exempts sources with certain qualifying criteria from B.A.T. if the qualifying criteria are met and the sources does not have the potential to emit more than 10 tpy of a pollutant. Because this source meets the qualifying criteria and the calculated annual emission rate for particulate emissions is less than 10 tpy, B.A.T. does not apply to particulate emissions. This exemption takes into account the use of a particulate filter.
	20 percent opacity, as a 6-minute average, from the stack	17-07(A)(1)	N	N	Y	Y	N	Y	Y	N	N	N	M, R, Rp - daily checks of VE in conformity with the State library terms. ET - This emissions unit has never been stack tested because anticipated emissions are so low. Method 9 will be used to demonstrate compliance.
	2.58 lb PE/hr	17-11(B)(1)	N	N	Y	Y	N	Y	Y	N	N	N	OR - particulate collection system is required. M, R, Rp -particulate emissions from this source are insignificant and do not merit extensive, monitoring,

													recordkeeping and reporting requirements. Employment of a fabric filter system and VE checks will be deemed adequate for M, R, Rp. ET - To determine the worst case PE rate, a one-time calculation shall be used: E(PE) = P x CONCsolid x EF(PE) x (1-CE) where: P = maximum mix production rate, which is 1000 lbs/hr as noted in the permit application. CONCsolid = maximum solids concentration in the mix, which is 625.0 lbs fillers/1000 lb batch as noted in the permit application. EF(PE) = Emission factor of 0.01 as noted in AP-42 Chapter 6.4, Reference 4 to Table 6.4-1 (1/95). CE = efficiency of PE control device is 99.0%, or 0.99, as specified in the permit application. This emissions unit has never been stack tested. Particulate emissions are <25 tpy: no stack testing will be required.
	Applicability of OAC rule 3745-21-07(G)	21-07(G)(2)	N	Y	N	N	N	N	N	N	N	N	ND – OAC rule 3745-21-07(G) has been removed from the SIP.
	Work practice standards must be followed in accordance with the applicable portions of Table 1 of this rule.	21-25	N	N	Y	Y	N	Y	Y	N	N	N	OR,M,R,Rp – compliance demonstrated by OEPA library terms ET – none required. This applicable regulation sets no emissions limitation.
	Applicable work practice standards	N	Y	N	Y	Y	N	Y	Y	N	N	N	Basis - 40 CFR Part 63, Subpart WWWW and applicable portions of 40 CFR Part 63, Subpart A, which became applicable to the facility on December 5, 2009. OR,M, R, Rp - are based on the compliance option(s)

													of 40 CFR Part 63, Subpart WWWW. ET - this emissions unit has never been stack tested. ET is based on the compliance option(s) of 40 CFR 63, Subpart WWWW
P002, P003: Pultrusion Lines A & B equipped with cut-off saw and a common baghouse	3.0lbs volatile organic compound emissions/hr;	N	Y	N	N	N	N	N	N	N	N	N	Basis - ORC 3704.03(T) established by P0110677, as issued on November 21, 2012. M, R &Rp – VOC emissions based on PTE along with work practice standards of OAC rule 3745-21-25 ET - No stack testing required. If necessary, 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, and/or 40 CFR Part 51, Appendix M, Methods 204 A through F as appropriate, will be used to demonstrate compliance.
	Particulate emissions (PE) shall not exceed 0.009 pound per hour and 0.04 ton per rolling, 12-month period.	N	Y	N	Y	Y	N	Y	Y	N	N	N	Basis - OAC rule 3745-31-05(A)(3), as effective 11/30/01. 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 limits will no longer apply. M,R,Rp,ET – compliance demonstrated by use of a particulate filter and VE checks.
	B.A.T. does not apply for uncontrolled particulate emissions because the potential to emit PE <10 tpy	N	Y	Y	N	N	N	N	N	N	N	N	Basis - OAC rule 3745-31-05(A)(3)(a)(ii): S.B. 265, enacted August 3, 2006, exempts sources with certain qualifying criteria from B.A.T. if the qualifying criteria are met and the sources does not have the potential to emit more than 10 tpy of a pollutant. Because this source meets the qualifying criteria and the calculated annual emission rate for particulate emissions is less than 10 tpy, B.A.T. does not apply to particulate emissions. This exemption represents PTE and requires the use of a particulate filter required by OAC rule 3745-17-11(B) to demonstrate compliance.

20 percent opacity, as a 6-minute average, from the stack	17-07(A)(1)	N	N	Y	Y	N	Y	Y	N	N	N	M, R, Rp - daily checks of VE in conformity with the State library terms. ET - This emissions unit has never been stack tested because anticipated emissions are so low. Method 9 will be used to demonstrate compliance.
1.07 lb PE/hr	17-11(B)(1)	N	N	Y	Y	N	Y	Y	N	N	N	OR - particulate collection system is required. M, R, Rp -particulate emissions from this source are insignificant and do not merit extensive, monitoring, recordkeeping and reporting requirements. Employment of a fabric filter system and VE checks will be deemed adequate for M, R, Rp. ET - To determine the worst case PE rate, a one-time calculation shall be used: PE(SAW) = V(SC) x CUT(MIN) x DENSITY X (1- CE) x 60 MIN/HR where: PE(SAW) = particulate emission on cut-off saw on pultrusion line (lbs/hr) V(SC) = volume of material removed by saw cut (cross sectional area x width of blade), blade width (0.1875 in), cross sectional area (0.0625 ft2) totaling (0.001 ft3) CUT(MIN)= 0.500 cuts/minute DENSITY= 12 lb/ft3 CE= control efficiency (99%) This emissions unit has never been stack tested. Particulate emissions are <25 tpy: no stack testing will be required.
Applicability of OAC rule 3745-21-07(G)	21-07(G)(2)	N	Y	N	N	N	N	N	N	N	N	ND – OAC rule 3745-21-07(G) has been removed from the SIP.

	Reduce total VOC emissions by at least sixty percent by weight. Work practice standards must be followed in accordance with the applicable portions of Table 1 of this rule.	21-25	N	N	Y	Y	N	Y	Y	N	N	N	OR,M,R,Rp – compliance demonstrated by OEPA library terms ET – none required. This applicable regulation sets no emissions limitation. VOC reduction demonstrated by M,R, and Rp terms.
	Reduce total organic HAP emissions by at least 60 weight percent either on an individual basis or by averaging and applicable work practice standards	N	Y	N	Y	Y	N	Y	Y	N	N	N	Basis - 40 CFR Part 63, Subpart WWWW and applicable portions of 40 CFR Part 63, Subpart A. OR,M, R, Rp - are based on the compliance option(s) of 40 CFR Part 63, Subpart WWWW. ET - this emissions unit has never been stack tested. ET is based on the compliance option(s) of 40 CFR 63, Subpart WWWW
P004, P005, P006, Pultrusion Lines C - E equipped with cut-off saw and a common baghouse	4.9lbs volatile organic compound emissions/hr;	N	Y	N	N	N	N	N	N	N	N	N	Basis - ORC 3704.03(T) established by P0110677, as issued on November 21, 2012. M,R&Rp - VOC emissions based on PTE along with work practice standards of OAC rule 3745-21-25 ET - No stack testing required. If necessary, 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, and/or 40 CFR Part 51, Appendix M, Methods 204 A through F as appropriate, will be used to demonstrate compliance.
	Particulate emissions (PE) shall not exceed 0.02 pound per hour and 0.09 ton	N	Y	N	Y	Y	N	Y	Y	N	N	N	Basis - OAC rule 3745-31-05(A)(3), as effective 11/30/01. 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

per rolling, 12-month period.												approves the December 1, 2006 version of 3745-31-05, then these emission limits will no longer apply. M,R,Rp,ET – compliance demonstrated by use of a particulate filter and VE checks.
B.A.T. does not apply for uncontrolled particulate emissions because the potential to emit PE <10 tpy	N	Y	Y	N	N	N	N	N	N	N	N	Basis - OAC rule 3745-31-05(A)(3)(a)(ii): S.B. 265, enacted August 3, 2006, exempts sources with certain qualifying criteria from B.A.T. if the qualifying criteria are met and the sources does not have the potential to emit more than 10 tpy of a pollutant. Because this source meets the qualifying criteria and the calculated annual emission rate for particulate emissions is less than 10 tpy, B.A.T. does not apply to particulate emissions. This exemption represents PTE and requires the use of a particulate filter required by OAC rule 3745-17-11(B) to demonstrate compliance.
20 percent opacity, as a 6-minute average, from the stack	17-07(A)(1)	N	N	Y	Y	N	Y	Y	N	N	N	OR - particulate collection system is required M, R, Rp - tracking non-usage of particulate filtration is required with daily checks of VE in conformity with the State library terms ET - This emissions unit has never been stack tested because anticipated emissions are so low. Method 9 will be used to demonstrate compliance.
1.07 lb PE/hr	17-11(B)(1)	N	N	Y	Y	N	Y	Y	N	N	N	OR - particulate collection system is required. M, R, Rp -particulate emissions from this source are insignificant and do not merit extensive, monitoring, recordkeeping and reporting requirements. Employment of a fabric filter system and VE checks will be deemed adequate for M, R, Rp. ET - To determine the worst case PE rate, a one-time calculation shall be used: PE(SAW) = V(SC) x CUT(MIN) x DENSITY X (1- CE) x 60 MIN/HR where:

													PE(SAW) = particulate emission on cut-off saw on pultrusion line (lbs/hr) V(SC) = volume of material removed by saw cut (cross sectional area x width of blade), blade width (0.1875 in), cross sectional area (0.0625 ft2) totaling (0.001 ft3) CUT(MIN)= 0.667 cuts/minute DENSITY= 12 lb/ft3 CE= control efficiency (99%) ET - This emissions unit has never been stack tested. Particulate emissions are <25 tpy: no stack testing will be required.
	Applicability of OAC rule 3745-21-07(G)	21-07(G)(2)	N	Y	N	N	N	N	N	N	N	N	ND – OAC rule 3745-21-07(G) has been removed from the SIP.
	Reduce total VOC emissions by at least sixty percent by weight. Work practice standards must be followed in accordance with the applicable portions of Table 1 of this rule.	21-25	N	N	Y	Y	N	Y	Y	N	N	N	OR,M,R,Rp – require compliance with the language of the regulation. ET – none required. This applicable regulation sets no emissions limitation.
	Reduce total organic HAP emissions by at least 60 weight percent either on an individual basis or	N	Y	N	Y	Y	N	Y	Y	N	N	N	Basis - 40 CFR Part 63, Subpart WWWW and applicable portions of 40 CFR Part 63, Subpart A. OR, M, R, Rp - are based on the compliance option(s) of 40 CFR Part 63, Subpart WWWW. ET - this emissions unit has never been stack tested.

	by averaging and applicable work practice standards												ET is based on the compliance option(s) of 40 CFR 63, Subpart WWWW.
P014 Coating Dryer Oven	The emissions stack serving this emission unit shall not exceed: CO - 0.15#/hr& 0.66 tpy, NOx - 0.18#/hr& 0.79 tpy, PE - 0.01#/hr& 0.05 tpy, SO2 - 0.01#/hr& 0.05 tpy, VOC - 1.10#/hr& 2.74 tpy.	N	Y	N	Y	Y	N	Y	Y	N	N	N	Basis - OAC rule 3745-31-05(A)(3), as effective 11/30/01. 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 limits will no longer apply. M,R,Rp,ET – compliance demonstrated by OEPA library terms for operating the oven burners exclusively with natural gas and tracking of the coating usage of K001 and K002.
	B.A.T. does not apply for uncontrolled particulate emissions because the potential to emit PE <10 tpy	N	Y	Y	N	N	N	N	N	N	N	N	Basis - OAC rule 3745-31-05(A)(3)(a)(ii): S.B. 265, enacted August 3, 2006, exempts sources with certain qualifying criteria from B.A.T. if the qualifying criteria are met and the sources does not have the potential to emit more than 10 tpy of a pollutant. Because this source meets the qualifying criteria and the calculated annual emission rate for all criteria pollutants is less than 10 tpy, B.A.T. does not apply. This exemption represents PTE and requires the exclusive use of natural gas in the oven burners.
	VOC emissions shall not exceed 3#/hr and 15#/day unless discharge has been reduced at least 85% by weight.	21-07(M)(4)	N	N	N	Y	N	Y	Y	N	N	N	M,R,Rp – compliance demonstrated by tracking of coating usage and VOC content in K001 and K002 for which this emissions unit is used. ET - Coating usage and VOC content record-keeping establish compliance. No additional stack testing required.

	None	17-11(B)(1)	N	Y	N	N	N	N	N	N	N	N	Exempt – gaseous fuels and combustion air are not considered to be part of materials introduced to a process.
	None	18-06(A)	N	N	Y	Y	N	Y	Y	N	N	N	OR – exclusive combustion of natural gas M,R,Rp – since pipeline quality gas will meet the SO2 limitation, only monitoring of exclusive use of natural gas is required
	None	17-07(A)(1)	N	Y	N	N	N	N	N	N	N	N	Exempted by the provisions of OAC rule 3745-17-07(A)(3)(h).

DRAFT

Division of Air Pollution Control
Title V Permit
for
Comfort Line Ltd.

Facility ID:	0448011664
Permit Number:	P0108553
Permit Type:	Significant Permit Modification
Issued:	3/18/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Comfort Line Ltd.

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Authorization

Facility ID:	0448011664
Facility Description:	Manufacture of extruded plastics
Application Number(s):	A0042453
Permit Number:	P0108553
Permit Description:	Title V Significant Permit Modification to incorporate a Chapter 31 modification of K001 and K002 to increase allowable VOC due to a change in coatings. This also takes into consideration the recent revisions to OAC rule 3745-21-07 and applicability of OAC rule 3745-21-25.
Permit Type:	Significant Permit Modification
Issue Date:	3/18/2013
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0105249

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

Comfort Line Ltd.
5500 Enterprise Blvd
Toledo, OH 43612

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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 Toledo Department of Environmental Services. 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 Toledo Department of Environmental Services.

(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 combined emissions of Volatile Organic Compounds (VOC) from all emission units at this facility shall not exceed 90.00 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

   The combined emissions of VOC shall include the following emission units: K001, K002, P001, P002, P003, P004, P005, P006 and P014.

3. The permittee shall collect and record the following information monthly for the purpose of determining compliance with the rolling, 12-month VOC emission limitation::

   a) for K001, K002 and P014:

      (1) the company identification for each coating material employed;

      (2) the number of gallons of each coating, as employed;

      (3) the organic compound content of each coating, as employed, in pounds per gallon;

      (4) the total VOC emission rate for all coatings employed calculated as a summation of a)(2) x a)(3) for all coatings, in pounds per month;

   b) for P001:

      (1) the company identification of each resin employed;

      (2) the weight of each resin employed in pounds;

      (3) the VOC content of each resin employed (e.g., styrene), in percent by weight;

      (4) the total VOC emission rate for all resin employed calculated as the summation of b)(2) x b)(3) for all resins multiplied by the emissions factor of 0.005 pound VOC per pound of available VOC content (determined from results of a U.S. EPA Method 204-compliant temporary total enclosure VOC emissions test, conducted on 9/30/2004 at Continental Structural Plastics in Ohio, 0204020245, using a MACT compliant covered mixer), in pounds per month;

   c) for P002, P003, P004, P005 and P006:

      (1) the company identification of each resin employed;

      (2) the weight of each resin employed in pounds;

      (3) the VOC content of each resin employed, in percent by weight;

      (4) the total VOC emission rate for all resin employed calculated as the summation of c)(2) x c)(3) for all resins multiplied by the emissions factor of 0.04 pound VOC per pound of

available VOC content (AP-42 Chapter 4.4, Table 4.4-2 dated 2/07), in pounds per month;

(5) when employing enclosures or resin injection (direct or perform), actual emissions may be calculated as four tenths or one tenth, respectively, of open line emissions; and

(6) as provided in OAC rule 3745-21-25(F)(3)(a), the permittee may use the cited emissions factors or may calculate the VOC emissions factor based on the equations from AP-42, or site specific VOC emissions factors if they are supported by VOC emissions test data. The organic HAP emissions factors in table 1 to Subpart WWWW of 40 CFR Part 63 are equivalent to the VOC emissions factors for this requirement. Permittee shall notify the Toledo Division of Environmental Services of any change in emission factors. Permittee shall notify the Ohio EPA (Toledo Divisioni of Environmental Services) of any change in emission factors.

d) for all emissions units facility-wide:

(1) the company identification for each cleanup material employed;

(2) the volume of each cleanup material applied in gallons;

(3) the VOC content of each cleanup material applied in pounds per gallon;

(4) the volume of cleanup material waste collected (if claiming credit for waste) in gallons;

(5) the estimated or calculated VOC content of cleanup material waste in pounds per gallon; and

(6) the total VOC emission rate for all clean-up materials employed calculated as a summation of [d)(2) x d)(3)] – [d)(4) x d)(5)] for all cleanup materials, in pounds per month;

e) the monthly VOC emissions rate from all emissions units, calculated as a summation of the total VOC emissions rates from all coatings, resins and clean-up materials recorded above divided by 2000 pounds per ton, in tons per month; and

f) the rolling, 12-month summation of the VOC emissions, calculated by adding the current month's VOC emissions from all emission units at this facility to the VOC emissions for the preceding eleven calendar months from all emission units at this facility, in tons.

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC. These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions, of this permit.

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

6. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #P0110677, issued on 11/21/2012:B.3.d)(4) through

B.3.d)(6). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

8. The following emission units contained in this permit are subject to 40 CFR Part 63, Subpart PPPP: K001 and K002. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District Office or local air agency.

9. The following emissions units contained in this permit are subject to the applicable requirements of 40 CFR Part 63, Subparts A and WWWW: P001, P002, P003, P004, P005 and P006. 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 Toledo Division of Environmental Services.

10. The following insignificant emissions units are located at this facility that are enforceable under state law only:

B001	47 gas fired space heaters	Permit exempt
F001	Aerosol paint touch up	De minimus
F002	Non paint clean up	De minimus
F003	Grinding/welding	Permit exempt
T001	Dip tanks	Permit exempt
Z004	Parts washer	Permit exempt
Z006	Acetone reclaimer	De minimus
Z007	Paint solvent reclaimer	De minimus

C. Emissions Unit Terms and Conditions

1. K001, Main Paint Line

Operations, Property and/or Equipment Description:

Main coating line for fiberglass reinforced pultruded styrene resin with particulate control by a dry particulate filter system.

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
K001 - Coating Line for fiberglass reinforced pultruded styrene resin		
a.	ORC 3704.03(T) (PTI P0110554 issued 9/26/12)	Volatile organic compound (VOC) emissions from coatings employed shall not exceed 79.5 tons per year. The requirements of this rule also include compliance with 40 CFR Part 63 Subpart PPPP. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI P0110554 issued 9/26/12)	Particulate emissions (PE) from the stack serving this emissions unit shall not exceed 0.23 pound per hour and 1.01 tons per year. See b)(2)b. and b)(2)c.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06 (PTI P0110554 issued 9/26/12)	See b)(2)d.
d.	40 CFR Part 63 Subpart PPPP (40 CFR 63.4480 through 63.4581) [In accordance with 40 CFR 63.4481, this emissions unit is an existing surface coating operation at a major HAP source subject to the emissions limitations/control	Organic hazardous air pollutants(HAP) emissions from all coating operations onsite shall not exceed 0.16 pounds per pound of coating solids applied during each 12-month compliance period. See b)(2)e.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	measures specified in this section.]	
e.	40 CFR Part 63 Subpart A (40 CFR 63.1 through 63.16)	See b)(2)f.
f.	OAC rule 3745-17-07(A)(1)	Visible emissions (VE) from this emissions unit shall not exceed 20% opacity as a 6-minute average.
g.	OAC rule 3745-17-11(C)(1), (C)(2)	See b)(2)g.

(2) Additional Terms and Conditions

a. The annual VOC emission limitation reflects the potential to emit for this emissions unit at the company stated maximum rate of coating application rate (5 gallons per hour) and the maximum coating VOC content (3.63 pounds VOC per gallon coating). Therefore, it is not necessary to develop separate monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

b. The hourly and annual particulate emission limitations reflect the potential to emit for this emissions unit while maintaining compliance with OAC rule 3745-17-11(C) by the use of a dry fabric filtration system. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

c. The permittee has satisfied the Best Available Technology (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 pollutant less than ten tons per year. However, that rule revision has not 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 limit/control measures no longer apply.

d. The following terms and conditions apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this source since the calculated annual emissions rate for PE is less than 10 tons per year taking into account the federally enforceable control requirements under OAC rule 3745-17-11(C).

e. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart PPPP.

The final rules found in 40 CFR Part 63, Subpart PPPP establish national emission standards for HAP, work practice standards, operating limitations, and compliance requirements for plastic parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of plastic parts and products:

i. all coating operations as defined in 40 CFR 63.4581;

ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee, using the "compliant material" option, shall not apply any coating in the coating operation(s) with an HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives, and cleaning/purge materials applied shall not contain HAP. If any individual coating applied does not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains HAP, the mass average HAP emission rate shall be calculated as required in 40 CFR 63.4551 and 63.4552 for the compliance period.

If the permittee chooses to use the "compliant coating option" for any coating or a group of coatings, in order to demonstrate compliance with this NESHAP, such coating operation(s) shall not apply any coating with an organic HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives, and cleaning/purge materials applied shall not contain HAP. If any individual material, used within a group of materials applied in the "compliant coating operation", exceeds the emission limitation for that coating group; or a thinner, additive, or cleaning/purge material containing an HAP is applied, the mass average HAP content for the coating operations must be calculated as required in this permit.

For any coating operation(s) that is meeting the emission limitations in 40 CFR 63.4490 by using the "without add-on control" option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month and on a rolling, 12-month basis following the initial compliance period, i.e., the mass average HAP emission rate shall be calculated each month as required in 40 CFR 63.4551 and 63.4552.

f. Table 2 to 40 CFR Part 63, Subpart PPPP shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.

g. The permittee shall control the particulate emissions (PE) from the coating operations of emissions unit with a dry particulate filter, or equivalent, and shall comply with the work practice requirements of OAC rule 3745-17-11(C)(2)(a) through (g).

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 filterin 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) and OAC rule 3745-17-11(C))

(3) The permittee shall comply with the applicable restrictions required under 40 CFR part 63, Subpart PPPP, including the following sections:

63.4491(a)	Compliant coating option.
63.4491(b)	Emission rate without add-on controls option.
63.4492(a)	Exemption from operational limits while using compliant coating or emission rate without add-on control options.
63.4493(a)	Exemption from work practice standards while using compliant coating or emission rate without add-on control options.
63.4500(a)(1)	Shall be in compliance with the applicable emission limit in 40 CFR 63.4490 at all times.
63.4500(b)	Operate emission unit according to the provisions in 40 CFR 63.6(e)(1)(i).

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

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

(2) 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) and OAC rule 3745-17-11(C))

(3) 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) and OAC rule 3745-17-11(C))

(4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

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

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

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

(6) The permittee shall collect and record monthly the following information for the coating operation:

a. the company identification for each coating and reduction solvent;

b. the number of gallons of each coating employed, as applied;

c. the volatile organic compound content of each coating employed, in pounds per gallon as applied; and

d. the total volatile organic compound emission rate for all coatings, in pounds per month (b. x c.).

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

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

63.4530(a)	Required record retention of reports, notifications and supporting documentation.
63.4530(b)	Required records of information provided by materials suppliers or manufacturers.
63.4530(c) through (h)	Required records for each compliance period.
63.4531(a) – (c)	Record retention policy.
63.4542(a) – (c), 63.4552 (a) – (c)	Requirements for continuous compliance with emission limits for compliant coating option or without add-on controls option, respectively.

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

e) Reporting Requirements

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

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

b. any exceedance of the maximum application rate of 5.0 gallons per hour or the 3.68 pounds VOC per gallon coating maximum VOC content for any coating, and the amount of such exceedance; and

c. if no deviations, report no deviations.

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

(2) The permittee shall semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart PPPP, per the following sections:

63.4520(a)	Semiannual compliance report.

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

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

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

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

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

79.50 tons of VOC per year.

Applicable Compliance Method:

The annual emissions limitation was established based on a one-time calculation of the worst case operating scenario, as follows: multiply the maximum rate of coating application rate (5 gallon per hour), by the maximum coating VOC content (3.63 pounds VOC per gallon coating) and by the maximum annual hours of operation (8760 hours per year) and divide by 2000 pounds per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and ORC3704.03(T))

b. Emission Limitation:

VE shall not exceed 20% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method:

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

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

c. Emission Limitation:

0.23 pound of PE per hour.

Applicable Compliance Method:

If requested, the permittee shall demonstrate compliance with the above emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

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

d. Emission Limitation:

1.01 tons of PE per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable particulate emission limitation (0.23 pound per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

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

e. Emission Limitation:

0.16 pound of HAP per pound of coatings solids

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods set forth in 40 CFR 63 Subpart PPPP under the "compliant coatings" (40 CFR 63.4542) or "emission rate without add-on controls" (40 CFR 63.4552), as appropriate.

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

g) Miscellaneous Requirements

(1) When the associated drying oven (P014) is operating, for purposed of calculating the organic compound emission rates for this emissions unit and the associated oven (P014), the permittee shall utilize a value of 95% as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from the emissions unit. The remaining 5% of the organic compounds employed in this emissions unit shall be considered to be uncontrolled emissions for the associated oven. This "split" of organic compound emissions between this emissions unit and the associated oven is based upon the amount reported in application.

2. K002, Custom Paint Line

Operations, Property and/or Equipment Description:

Coating line for fiberglass reinforced pultruded styrene resin with particulate control by a dry particulate filter system.

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
K002 - Coating Line for fiberglass reinforced pultruded styrene resin		
a.	ORC 3704.03(T) (PTI P0110554 issued 9/26/12)	The emissions of volatile organic compound (VOC) from the coatings employed in this emissions unit shall not exceed 15.90 tons per year. The requirements of this rule also include compliance with 40 CFR Part 63 Subpart PPPP. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI P0110554 issued 9/26/12)	Particulate emissions (PE) from the stack serving this emissions unit shall not exceed 0.05 pound per hour and 0.22 ton per year. See b)(2)b. and b)(2)c.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06 (PTI P0110554 issued 9/26/12)	See b)(2)d.
d.	40 CFR Part 63 Subpart PPPP (40 CFR 63.4480 through 63.4581) [In accordance with 40 CFR 63.4481, this emissions unit is an existing surface coating operation at a major HAP source subject to the	Organic hazardous air pollutants(HAP) emissions from all coating operations onsite shall not exceed 0.16 pound per pound of coating solids applied during each 12-month compliance period. See b)(2)e.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	emissions limitations/control measures specified in this section.]	
e.	40 CFR Part 63, Subpart A (40 CFR 63.1 through 63.16	See b)(2)f.
f.	OAC rule 3745-17-07(A)(1)	Visible emissions (VE) from this emissions unit shall not exceed 20% opacity as a 6-minute average.
g.	OAC rule 3745-17-11(C)(1), (C)(2)	See b)(2)g.

(2) Additional Terms and Conditions

a. The annual VOC emission limitation reflects the potential to emit for this emissions unit at the company stated maximum rate of coating application rate (1 gallon per hour) and the maximum coating VOC content (3.63 pounds VOC per gallon coating). Therefore, it is not necessary to develop separate monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

b. The hourly and annual particulate emission limitations reflect the potential to emit for this emissions unit while maintaining compliance with OAC rule 3745-17-11(C) by the use of a dry fabric filtration system. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

c. The permittee has satisfied the Best Available Technology (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 pollutant less than ten tons per year. However, that rule revision has not 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 limits/control measures no longer apply.

d. The following terms and conditions apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminate source since the calculated annual emissions rate for PE is less that 10 tons per year taking into account the federally enforceable control requirements under OAC rule 3745-17-11(C).

e. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart PPPP.

The final rules found in 40 CFR Part 63, Subpart PPPP establish national emission standards for HAP, work practice standards, operating limitations, and compliance requirements for plastic parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of plastic parts and products:

i. all coating operations as defined in 40 CFR 63.4581;

ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee shall be subject to the requirements and limitations of this NESHAP on December 5, 2007, at which time the initial compliance period begins for the coating operations; and the initial compliance period ends on December 30, 2008.

The permittee, using the "compliant material" option, shall not apply any coating in the coating operation(s) with an HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives, and cleaning/purge materials applied shall not contain HAP. If any individual coating applied does not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains organic HAP, the mass average HAP emission rate shall be calculated as required in 40 CFR 63.4551 and 63.4552 for the compliance period.

If the permittee chooses to use the "compliant coating option" for any coating or a group of coatings, in order to demonstrate compliance with this NESHAP, such coating operation(s) shall not apply any coating with an HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives, and cleaning/purge materials applied shall not contain HAP. If any individual material, used within a group of materials applied in the "compliant coating operation", exceeds the emission limitation for that coating group; or a thinner, additive, or cleaning/purge material containing an HAP is applied, the mass average HAP content for the coating operations must be calculated as required in this permit.

For any coating operation(s) that is meeting the emission limitations in 40 CFR 63.4490 by using the "without add-on control" option, the permittee shall maintain

the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month and on a rolling, 12-month basis following the initial compliance period, i.e., the mass average HAP emission rate shall be calculated each month as required in 40 CFR 63.4551 and 63.4552.

f. Table 2 to 40 CFR Part 63, Subpart PPPP shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.

g. The permittee shall control the particulate emissions (PE) from the coating operations of emissions unit with a dry particulate filtration system, or equivalent, and shall comply with the work practice requirements of OAC rule 3745-17-11(C)(2)(a) through (g).

c) Operational Restrictions

(1) The permittee shall operate the dry particulate 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 dry 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))

(3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart PPPP, including the following sections:

63.4491(a)	Compliant coating option.
63.4491(b)	Emission rate without add-on controls option.
63.4492(a)	Exemption from operational limits while using compliant coating or emission rate without add-on control options.
63.4493(a)	Exemption from work practice standards while using compliant coating or emission rate without add-on control options.
63.4500(a)(1)	Shall be in compliance with the applicable emission limit in 40 CFR 63.4490 at all times.

63.4500(b)	Operate emission unit according to the provisions in 40 CFR 63.6(e)(1)(i).

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

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

(2) 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))

(3) 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))

(4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

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

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

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

(6) The permittee shall collect and record monthly the following information for the coating operation:

a. the company identification for each coating and reduction solvent;

b. the number of gallons of each coating employed, as applied;

c. the volatile organic compound content of each coating employed, in pounds per gallon as applied; and

d. the total volatile organic compound emission rate for all coatings, in pounds per month (b. x c.);

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

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

63.4530(a)	Required record retention of reports, notifications and supporting documentation.
63.4530(b)	Required records of information provided by materials suppliers or manufacturers.
63.4530(c) through (h)	Required records for each compliance period.
63.4531(a) – (c)	Record retention policy.
63.4542(a) – (c), 63.4552 (a) – (c)	Requirements for continuous compliance with emission limits for compliant coating option or without add-on controls option, respectively.

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

e) Reporting Requirements

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

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

b. any exceedance of the maximum application rate of 1.0 gallon per hour or of the 3.68 pounds VOC per gallon coating maximum VOC content for any coating, and the amount of such exceedance; and

c. if no deviations, report no deviations.

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

(2) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart PPPP, per the following sections:

63.4520(a)	Semiannual compliance report.

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

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

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.4520(a))

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

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

VE shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

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

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

b. Emission Limitation:

0.16 pounds of organic HAP emissions per pound of coating solids.

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods set forth in 40 CFR 63 Subpart PPPP under the "compliant coatings" (40 CFR 63.4442) or "emission rate without add-on controls" (40 CFR 63.4552), as appropriate.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.4551)

c. Emission Limitation:

15.90 tons of VOC year.

Applicable Compliance Method:

The annual emissions limitation was established based on a one-time calculation of the worst case operating scenario, as follows: multiply the maximum rate of coating application rate (1 gallon per hour), by the maximum coating VOC content (3.63 pounds VOC per gallon coating) and by the maximum annual hours of operation (8760 hours per year) and divide by 2000 pounds per ton.

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

d. Emission Limitation:

0.05 pound of PE per hour.

Applicable Compliance Method:

If requested, the permittee shall demonstrate compliance with the above emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(10).

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

e. Emission Limitation:

0.22 ton of PE per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable particulate emission limitation (0.05 pound per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

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

g) Miscellaneous Requirements

(1) When the associated drying oven (P014) is operating, for purposes of calculating the organic compound emission rates for this emissions unit and the associated oven (P014), the permittee shall utilize a value of 95% as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from the emissions unit. The remaining 5% of the organic compounds employed in this emissions unit shall be considered to be uncontrolled emissions for the associated oven. This “split” of organic compound emissions between this emissions unit and the associated oven is based upon the amount reported in the application.

3. P001, Mixer 1

Operations, Property and/or Equipment Description:

Resin blending mixer 1 with particulate filtration system.

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 04-01457, issued 12/5/2006)	Volatile organic compound (VOC) emissions shall not exceed 1.88 pounds per hour. See b)(2)a., b)(2)b., and b)(2)c.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (P0105966, issued 7/7/2010)	Particulate emissions (PE) from the stack serving this emissions unit shall not exceed 0.07 pound per hour and 0.31 ton per year. See b)(2)d.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006 (P0105966, issued 7/7/2010)	See b)(2)e.
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935) [In accordance with 40 CFR 63.5785(a), this emissions unit is a mixing operation at an existing area source that became a major source after the date of publication of this subpart and subject to the emissions limitations/control measures specified in this section.]	The permittee shall follow work practice standards in accordance with the applicable portions of 40 CFR 63.5805 and Table 4.
e.	40 CFR Part 63, Subpart A	See b)(2)f.
f.	OAC rule 3745-17-07(A)(1)	Visible emissions (VE) from this emission

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		unit shall not exceed 20% opacity as a 6-minute average.
g.	OAC rule 3745-17-11(B)(1)	PE from the stack serving this emissions unit shall not exceed 2.58 pounds per hour.
h.	OAC rule 3745-21-25	The permittee shall follow the work practice standards in accordance with the applicable portions of Table 1 of this rule.

(2) Additional Terms and Conditions

a. The VOC emissions from the mixing operation consist of styrene.

b. The hourly VOC emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop separate monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations. The permittee shall submit a new application and be issued a new permit if a new process material is to be used that would cause the emissions unit to exceed the permitted potential to emit established in this permit.

c. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), and OAC rule 3745-21-25.

d. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 pollutant less than ten tons per year. However, that rule revision has not yet been approved by the 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 requirements 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 limits/control measures no longer apply.

e. The following terms and conditions apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this source since the controlled annual emissions rate for PE is less that 10 tons/yr taking into account the use of a particulate filtration system with a minimum control efficiency of 99% by weight.

f. Table 15 to 40 CFR Part 63, Subpart WWWW shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.

c) Operational Restrictions

(1) The permittee shall operate the particulate control, fabric filter system whenever this emissions unit is in operation.

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

(2) The permittee shall comply with the applicable restrictions required under OAC rule 3745-21-25, including Table 1 – Work practice standards.

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

(3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart WWWW, including the following sections:

63.5835(a), 63.5900(c)	Table 4 – work practice standards

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any time periods when the particulate filtration system was not in service when the emission unit was in operation.

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

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

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

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

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

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d. above or continue the daily check until the incident has ended.

The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

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

(3) If the daily checks show no visible emissions for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check by the permittee or an Ohio EPA inspector indicates visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of no visible emissions.

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

(4) The permittee shall comply with the applicable monitoring and record keeping requirements required under paragraph (O) and (P) of OAC rule 3745-21-25, including the following:

a. A certified statement that operations are in compliance with the work practice standards specified in Table 1 of this rule, as applicable.

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

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

63.5835(a)-(c)	General requirements for compliance.
63.5900(a)(4)	Table 4 – work practice standards.

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

e) Reporting Requirements

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

a. any daily record showing that the particulate filtration system was not in service when the emissions unit was in operation;

b. an identification of each day during which an inspection was not performed by the required frequency; and

c. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented.

If no deviations occurred during the reporting period, the permittee shall submit a quarterly report which states that no deviations occurred during that period.

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

(2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions.

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

(3) The permittee shall submit a semiannual compliance report that contains the information and submitted in the time frame specified in paragraph (Q) of OAC rule 3745-21-25. If the semiannual compliance report required by the Title V permit includes all the information required for this rule, the report for the Title V permit shall be deemed to satisfy any obligation for reporting for this rule.

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

(4) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart WWWW, per the following sections with the first report due:

63.5900(b)	Deviations shall be reported according to the requirements in 40 CFR 63.5910.
63.5910(a)	Table 14 - semi-annual compliance report
63.5910(b)	submittal date of reports in accordance with Table 14
63.5910(c)	content of compliance reports
63.5910(d)	submission of deviation reports
63.5910(f)	Submission of report if facility exceeds 100 tons HAP per year threshold.
63.5910(g)	Title V monitoring report allowance

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

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

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

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:

1.88 pounds of VOC per hour.

Applicable Compliance Method:

This emission limit represents the potential to emit and was developed based on the emission factor of 0.005 pound of VOC emissions per pound of resin (VOC content) (determined from results of a U.S. EPA Method 204-compliant temporary total enclosure VOC emissions test, conducted on 9/30/2004 at Continental Structural Plastics of Ohio, 0204020245, using a MACT compliant covered mixer). This emission factor was multiplied by the maximum mix rate of 1000 pounds pf paste per hour.

If required, the permittee shall demonstrate compliance with this emission limitation through testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. This test would also include the use of enclosure per U.S. EPA methods 204, 204B, and 204D of 40 CFR Part 60, Appendix A.

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

b. Emission Limitation:

2.58 pounds of PE per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

(Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1))

c. Emission Limitation:

0.07 pound of PE per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation though emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

(Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1))

d. Emission Limitation:

0.31 ton of PE per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable particulate emission limitation (0.07 pound per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

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

e. Emission Limitation:

Visible emissions shall not exceed 20% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method:

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

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

g) Miscellaneous Requirements

(1) None.

4. P014, Direct Gas-Fired Drying Oven

Operations, Property and/or Equipment Description:

Direct Gas-Fired Drying Oven associated with K001 and K002 and having maximum heat input rate of 1.8 mmBtu/hr

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 P0110554 issued 9/26/12)	The emissions of carbon monoxide (CO) from the stack serving this emission unit shall not exceed 0.15 pound per hour and 0.66 ton per rolling, 12-month period. The emissions of nitrogen oxides (NO_x) from the stack serving this emission unit shall not exceed 0.18 pound per hour and 0.79 ton per rolling, 12-month period. Particulate emissions (PE) from the stack serving this emission unit shall not exceed 0.01 pound per hour and 0.05 ton per rolling, 12-month period. The emissions of sulfur dioxide (SO_2) from the stack serving this emission unit shall not exceed 0.01 pound per hour and 0.05 ton per rolling, 12-month period. The emissions of volatile organic compounds (VOC) from the stack serving this emission unit shall not exceed 1.10 pounds per hour and 2.74 tons per rolling, 12-month period. See b)(2)a. through b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as	See b)(2)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	effective 12/1/06 (PTI P0110554 issued 9/26/12)	
c.	OAC rule 3745-17-07(A)(1)	Exempted by the provisions of OAC rule 3745-17-07(A)(3)(h).
d.	OAC rule 3745-17-11(B)(1)	See b)(2)e.
e.	OAC rule 3745-18-06(A)	See b)(2)f.
f.	OAC rule 3745-21-07(M)(4)	The emissions of organic materials into the atmosphere from this emission unit shall not exceed fifteen pounds in any one day, nor more than three pounds in any one hour unless said discharge has been reduced at least 85% by weight. See b)(2)g.
g.	OAC rule 3745-17-11(B)(1)	PE from the stack serving this emissions unit shall not exceed 2.58 pounds per hour.

(2) Additional Terms and Conditions

a. The hourly and annual emission limitations for CO, NO_x, PE and SO_2 from the combustion of natural gas were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

b. The hourly emission limitations for VOC are based on the maximum emissions from the combustion of natural gas added to 5% of the maximum emissions of VOC from coating lines K001 and K002, and represent the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

c. The permittee has satisfied the Best Available Technology (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 pollutant less than ten tons per year. However, that rule revision has not 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 limits/control measures no longer apply.

d. The following terms and conditions apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the CO, NO_x, PE, SO_2 and VOC emissions from this source since the uncontrolled annual emissions rate for each pollutant is less that 10 tons/yr.

e. For purposes of this applicable regulation, the weights of gaseous fuels and combustion air are not considered to be part of the weight of materials introduced to a process. Table I of the Appendix to OAC rule 3745-17-11 does not establish a particulate emission limitation for a process weight rate of zero.

f. OAC rule 3745-18-06(A) does not establish SO_2 emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore, this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the 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 3745-18-06, the requirements still exists as part of the federally-approved SIP for Ohio.

g. Permit to Install P0110554 for this air contaminant source takes into account the following restrictions, as proposed by the permittee:

i. a booth/oven split of 95/5 by weight for all VOC emissions from K001 and K002, and

ii. compliance with the VOC emissions limitations in K001 and K002.

c) Operational Restrictions

(1) The permittee shall only burn natural gas in the 1.8 mmBtu per hour direct gas-fired dryer oven.

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

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas in the 1.8 mmBtu per hour direct gas-fired dryer oven, the permittee shall maintain a record of the type and quantity of fuel burned in the oven.

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

(2) The permittee shall collect and record the following information for each day for the oven:

a. the company identification for each coating and reduction solvent in K001 and K002 for which the drying oven is utilized;

b. the number of gallons of each coating employed in K001 and K002, as applied, for which the drying oven was utilized;

c. the volatile organic compound content of each coating employed in K001 and K002, as applied, for which the drying oven was utilized;

d. the total volatile organic compound emission rate for all coatings employed in K001 and K002 for which the drying oven was utilized, in pounds per day (b. x c.); and

e. the volatile organic compound emission rate for all coatings employed in K001 and K002 attributable to the drying oven, calculated by multiplying the total volatile organic compound emission rate by the maximum percentage of the total volatile organic compound emissions associated with this emissions unit (as defined in condition g)(1) of this permit), in pounds per day (d. x 0.05).

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

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in the 1.8 mmBtu per hour direct gas-fired dryer oven as fuel. Each report shall be submitted to the Toledo Division of Environmental Services within 30 days after the deviation occurs.

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

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

a. an identification of each day during which the organic compound emissions exceeded 15 pounds per day, and the actual organic compound emissions for each such day.

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

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

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

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

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

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:

0.15 pound CO per hour.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in AP 42, Table 1.4-1, dated July 1998, as follows: divide the emission factor of 84 pounds of CO emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot and multiply by the maximum burner heat input capacity of 1.8 mmBtu per hour.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

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

b. Emission Limitation:

0.66 ton of CO per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the emission limitation of 0.15 pound of CO per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

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

c. Emission Limitation:

0.18 pound NO_x per hour.

Applicable Compliance Method:

This emission limitation was established based on emission factors specified in AP 42, Table 1.4-1, dated July 1998 as follows: divide the emission factor of 100 pounds of NO_x emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot and multiply by the maximum burner heat input capacity of 1.8 mmBtu per hour.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

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

d. Emission Limitation:

0.79 ton of NO_x per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the emission limitation of 0.18 pound of NO_x per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

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

e. Emission Limitation:

0.01 pound PE per hour

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in AP 42, Table 1.4-2, dated July 1998, as follows: divide the emission factor of 1.9 pounds of PE emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot and multiply by the maximum burner heat input capacity of 1.8 mmBtu per hour.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A. Alternatively, other U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

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

f. Emission Limitation:

0.05 ton of PE per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the emission limitation of 0.01 pound of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

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

g. Emission Limitation:

0.01 pound SO_2 per hour.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in AP 42, Table 1.4-2, dated July 1998, as follows: divide the emission factor of 0.6 pound of SO_2 emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot and multiply by the maximum burner heat input capacity of 1.8 mmBtu per hour.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60 Appendix A. Alternatively, other U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

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

h. Emission Limitation:

0.05 ton of SO_2 per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the emission limitation of 0.01 pound of SO_2 per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

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

i. Emission Limitation:

1.10 pounds VOC per hour.

Applicable Compliance Method:

This emissions limitation was established to represent the potential to emit of VOC from the products of combustion of natural gas from a 1.8 mmBtu per hour oven and 5% of the maximum rate of emission of coating VOC from coating lines K001 and K002, as follows:

the products of combustion of natural gas from a 1.8 mmBtu per hour oven are based on emission factors specified in AP 42, Table 1.4-2, dated July 1998, as follows: divide the emission factor of 5.5 pounds of VOC emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot and multiply by the maximum burner heat input capacity of 1.8 mmBtu per hour (0.01 pound of VOC per hour);

the emissions from the drying of coatings are based a booth/oven split of 95/5 by weight. The emissions of VOC from coating lines K001 & K002 are restricted by permit limitations of 18.15 pounds per hour from K001 and 3.63 pounds per hour from K002 ((18.15+3.63)(0.05) = 1.09 pounds of VOC per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

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

j. Emission Limitation:

3 pounds of OC per hour.

Applicable Compliance Method:

Compliance with this limitation can be shown, based on the potential to emit of VOC from the products of combustion of natural gas from a 1.8 mmBtu per hour oven and 5% of the maximum rate of emission of VOC coating from coating lines K001 and K002, as follows:

the products of combustion of natural gas from a 1.8 mmBtu per hour oven are based on emission factors specified in AP 42, Table 1.4-2, dated July 1998, as follows: divide the emission factor of 5.5 pounds of VOC emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot and multiply by the maximum burner heat input capacity of 1.8 mmBtu per hour (0.01 pound of VOC per hour);

the emissions from the drying of coatings are based a booth/oven split of 95/5 by weight. The emissions of VOC from coating lines K001 & K002 are restricted by permit limitations of 18.15 pounds per hour from K001 and 3.63 pounds per hour from K002 ((18.15+3.63)(0.05) = 1.09 pounds of VOC per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

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

k. Emission Limitation:

15 pounds of OC per day.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in d)(2).

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

l. Emission Limitation:

2.74 tons of VOC per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this emission limitation can be demonstrated by multiplying the daily emission limitation of 15 pounds per hour by 365 days per year and dividing by 2000 pounds per ton. Therefore, if compliance is shown with the daily limitation, compliance shall also be shown with the annual emission limitation.

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

g) Miscellaneous Requirements

(1) When this drying oven is operating, for purposes of calculating the organic compound emission rates for this emissions unit and the associated spray booths (K001 & K002), the permittee shall utilize a value of 95% as the maximum percentage of the organic compounds employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 5% of the organic compounds employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This split of organic compound emissions between this emissions unit and the associated spray booth is based upon the amounts reported in the application.

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

5. Emissions Unit Group - Pultrusion Streams A & B: P002, P003

EU ID	Operations, Property and/or Equipment Description
P002	Pultrusion Line A equipped with a cut-off saw and a common particulate filtration system.
P003	Pultrusion Line B equipped with a cut-off saw and a common particulate filtration system.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) (PTI P0110677 issued 11/21/2012)	The emissions of volatile organic compounds (VOC) shall not exceed 3.0 pounds per hour. See b)(2)a. and b)(2)b.
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001 (PTI P0110677 issued 11/21/2012)	Particulate emissions (PE) from the stack serving this emissions unit shall not exceed 0.009 pound per hour and 0.04 ton per year. See b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06 (PTI P0110677 issued 11/21/2012)	See b)(2)d.
c.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935) [In accordance with 40 CFR 63.5805(b), this emissions unit is a pultrusion operation at an existing area source that became a major source after the date of publication of this subpart subject to the emissions limitations/control	The permittee shall reduce total organic HAP emissions by at least 60 weight percent either on an individual basis or by averaging. [40 CFR 63.5805 and Table 3] The permittee shall follow work practice standards in accordance with the applicable portions of 40 CFR 63.5805

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	measures specified in this section.]	and Table 4 of this rule. See c)(3)
d.	40 CFR Part 63, Subpart A	See b)(2)e.
e.	OAC rule 3745-17-07(A)	Visible emissions of particulate from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average.
f.	OAC rule 3745-17-11(B)	Particulate Emissions (PE) from the stack serving this emissions unit shall not exceed 1.07 pounds per hour.
g.	OAC rule 3745-21-25	The permittee shall reduce total VOC emissions by at least sixty percent by weight either on an individual basis or by averaging. The permittee shall follow work practice standards in accordance with the applicable portions of Table 1 of this rule.

(2) Additional Terms and Conditions

a. The VOC emissions from the resin bath operation consist of styrene.

b. The hourly VOC emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop separate monitoring, record keeping, and/or reporting requirements to ensure compliance with these limitations. The permittee shall submit a new application and be issued a new permit if a new process material is to be used that would cause the emissions unit to exceed the permitted potential to emit established in this permit.

c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 pollutant less than ten tons per year. However, that rule revision has not 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 requirements 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 limits/control measures no longer apply.

d. The following terms and conditions apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

i. 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 controlled annual emissions rate for particulate emissions is less than ten tons per year taking into account the use of a particulate filtration system with a minimum control efficiency of 99% by weight.

e. Table 15 to 40 CFR Part 63, Subpart WWWW shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.

c) Operational Restrictions

(1) The permittee shall operate the particulate filtration system whenever this emissions unit is in operation.

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

(2) The permittee shall comply with the applicable restrictions required under OAC rule 3745-21-25, including the following sections:

a. Table 1 – work practice standards for cleaning operations and VOC-containing materials storage operations.

b. Table 2 – reduce total VOC emissions by at least sixty percent by weight using any of the options specified in OAC rule 3745-21-25(I)(1) through (I)(5).

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

(3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart WWWW, including the following sections:

63.5830(b)-(e)	standards for pultrusion operations subject to the 60 weight percent organic HAP emissions reduction requirement
63.5835(a)	Table 4 - work practice standards

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any time periods when the particulate filtration system was not in service when the emission unit was in operation.

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

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

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

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

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

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

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

(3) If the daily checks show no visible emissions for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check by the permittee or an Ohio EPA inspector indicates visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of no visible emissions.

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

(4) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25, paragraphs (O) and (P), which include:

a. a certified statement that operations are in compliance with the work practice standards specified in Table 1 of this rule, as applicable;

b. collecting and keeping records of resin use, monomer content, and operations where the resin is used. The monomer content records may be based on MSDS or on resin specifications supplied by the resin supplier;

c. for any operations listed in Table 2, 3, or 4 of this rule; all data, assumptions, and calculations used to determine monomer contents and VOC emissions factors; and

d. to demonstrate compliance with the enclosure opening time restrictions of OAC rule 3745-21-25(I)(2)(h) and (i), the owner or operator shall record all times that doors or covers of wet area enclosures are open in the pultrusion emission unit and there is resin present in the resin bath. Per OAC rule 3745-21-25(I)(2)(i), the time restrictions and this record keeping do not apply if the open doors or panels do not cause the limit of two times the puller window area to be exceeded.

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

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

63.5895(c)	resin and gel coat records
63.5895(e)	wet area enclosures records
63.5900(a)(2)	organic HAP content limits compliance
63.5915(a), (c), (d)	required overall records that should be maintained
63.5920(a)-(d)	Record retention and availability

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

e) Reporting Requirements

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

a. any daily record showing that the particulate filtration system was not in service when the emissions unit was in operation;

b. an identification of each day during which an inspection was not performed by the required frequency;

c. an identification of each month of a 12-month rolling period in which the total organic HAP emissions were not reduced at least 60 percent by weight. The actual emissions and the percent reduction shall be calculated for each such period.

If no deviations occurred during the reporting period, the permittee shall submit a quarterly report which states that no deviations occurred during that period.

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

(2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions.

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

(3) The permittee shall submit a semiannual compliance report that contains the relevant information and submitted on the stated dates as specified by paragraph (Q) of OAC rule 3745-21-25. If the semiannual compliance report required by the Title V permit includes all the information required for this rule, the report required by the Title V permit shall be deemed to satisfy any obligation for reporting for this rule.

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

(4) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart WWWW, per the following sections:

63.5900(b)	deviation reporting
63.5910(a)	table 14 - semi-annual compliance report
63.5910(b)	submittal date of reports in accordance with Table 14
63.5910(c)	content of compliance reports
63.5910(d)	submission of deviation reports
63.5910(f)	Submission of report if facility exceeds 100 tons HAP per year threshold.
63.5910(g)	Title V monitoring report allowance

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

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

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

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

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

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:

3.0 pounds of VOC per hour.

Applicable Compliance Method:

This emission limit represents the potential to emit based on a worst case scenario and was developed based on the emission factor of 0.04 pound of VOC emissions per pound of resin (VOC content) (AP-42 Chapter 4.4, Table 4.4-2 (2/07)). This emission factor was multiplied by the maximum resin content (37.5% by weight) in the maximum throughput of 198 pounds of paste per hour.

As provided in OAC rule 3745-21-25(F)(3)(a), the permittee may use the cited emission factor or may calculate the VOC emissions factor based on the equations in Table 1 to subpart WWWW of 40 CFR Part 63, or any VOC emissions factor approved by USEPA, such as emissions factors if they are supported by VOC emissions test data. The organic HAP emissions factors in Table 1 to Subpart WWW of 40 CFR Part 63 are equivalent to the VOC emissions factors for this requirement. Permittee shall notify the Ohio EPA (Toledo Division of Environmental Services) of any change in emission factors.

If required, the permittee shall demonstrate compliance with this emission limitation through testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents.

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

b. Emission Limitation:

1.07 pounds of PE per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emissions limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

(Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1))

c. Emission Limitation:

0.009 pound of PE per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thorugh 5 of 40 CFR part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

(Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1))

d. Emission Limiation:

0.04 ton of PE per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable particulate emission limitation (0.009 pound per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

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

e. Emission Limitation:

VE shall not exceed 20% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method:

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

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

f. Emission Limitation:

Reduce total organic HAP emissions by at least 60 weight percent either on an individual basis or by averaging.

Applicable Compliance Method:

The permittee shall demonstrate compliance through one of the options as required pursuant to 40 CFR 63, Subpart WWWW, per the following sections: 63.5830 and 63.5850.

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

g) Miscellaneous Requirements

(1) None.

6. Emissions Unit Group -Pultrusion Streams C, D & E: P004, P005, P006.

EU ID	Operations, Property and/or Equipment Description
P004	Pultrusion Line C equipped with a cut-off saw and a common particulate filtration system.
P005	Pultrusion Line D equipped with a cut-off saw and a common particulate filtration system.
P006	Pultrusion Line E equipped with a cut-off saw and a common particulate filtration system.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) (PTI P0110677 issued 11/21/2012)	The emissions of volatile organic compounds (VOC) shall not exceed 4.9 pounds per hour. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001 (PTI P0110677 issued 11/21/2012)	Particulate emissions (PE) from the stack serving this emissions unit shall not exceed 0.02 pound per hour and 0.09 ton per year. See b)(2)c.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006 (PTI P0110677 issued 11/21/2012)	See b)(2)d.
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935) [In accordance with 40 CFR 63.5805(b), this emissions unit is a pultrusion operation at an existing area source that became a major source after the date of publication of this subpart subject to the	Reduce total organic HAP emissions by at least 60 weight percent either on an individual basis or by averaging. [40 CFR 63.5805 and Table 3] Work practice standards must be followed in accordance with the applicable portions of 40 CFR 63.5805 and Table 4.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	emissions limitations/control measures specified in this section.]	
e.	40 CFR Part 63, Subpart A	See b)(2)e.
f.	OAC rule 3745-17-07(A)	Visible emissions of particulate from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average.
g.	OAC rule 3745-17-11(B)	Particulate Emissions (PE) from the stack serving this emissions unit shall not exceed 1.07 pounds per hour.
h.	OAC rule 3745-21-25	Reduce total VOC emissions by at least sixty percent by weight either on an individual basis or by averaging. Work practice standards must be followed in accordance with the applicable portions of Table 1 of this rule.

(2) Additional Terms and Conditions

a. The VOC emissions from the resin bath operation consist of styrene.

b. The hourly VOC emissions limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop separate monitoring, record keeping, and/or reporting requirements to ensure compliance with these limitations. The permittee shall submit a new application and be issued a new permit if a new process material is to be used that would cause the emissions unit to exceed the permitted potential to emit established in this permit.

c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 pollutant less than ten tons per year. However, that rule revision has not 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, then these emission limits/control measures no longer apply.

d. The following terms and conditions apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State implementation Plan.

i. 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 controlled annual emissions rate for PE is less than ten tons per year taking into account the use of a particulate filtration system with a minimum control efficiency of 99% by weight.

e. Table 15 to 40 CFR Part 63, Subpart WWWW shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.

c) Operational Restrictions

(1) The permittee shall operate the particulate filtration system whenever this emissions unit is in operation.

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

(2) The permittee shall comply with the applicable restrictions required under OAC rule 3745-21-25, including the following sections:

a. Table 1 – work practice standards for cleaning operations and VOC-contaiing materials storage operations.

b. Table 2 – reduce total VOC emissions by a least sixty percent by weight using any of the options specified in OAC ruel 3745-21-25(I)(1) through (I)(5).

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

(3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart WWWW, including the following sections:

63.5830(b)-(e)	standards for pultrusion operations subject to the 60 weight percent organic HAP emissions reduction requirement
63.5835(a)	Table 4 - work practice standards

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any time periods when the particulate filtration system was not in service when the emission unit was in operation.

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

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

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

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

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

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

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

(3) If the daily checks show no visible emissions for 30 consecutive operating days, the required frequency of visible emission checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check by the permittee or an Ohio EPA inspector indicates visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of no visible emissions.

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

(4) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25, paragraphs (O) and (P), which include:

a. employed certified statement that operations are in compliance with the work practice standards specified in Table 1 of this rule, as applicable;

b. collecting and keeping records of resin use, monomer content, and operations where the resin is used. The monomer content records may be based on MSDS or on resin specifications supplied by the resin supplier;

c. for any operations listed in Table 2, 3 or 4 of this rule; all data, assumptions, and calculations used to determine monomer contents and VOC emissions factors; and

d. to demonstrate compliance with the enclosure opening time restrictions of OAC rule 3745-21-25(I)(2)(h) and (i), the owner or operator shall record all times that doors or covers of wet area enclosures are open in the pultrusion emission unit and there is resin present in the resin bath. Per OAC rule 3745-21-25(I)(2)(i), the time restrictions and this record keeping do not apply if the open doors or panels do not cause the limit of two times the puller window area to be exceeded.

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

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

63.5895(c)	resin and gel coat records
63.5895(e)	wet area enclosures records
63.5900(a)(2)	organic HAP content limits compliance
63.5915(a), (c), (d)	required overall records that should be maintained
63.5920(a)-(d)	Record retention and availability

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

e) Reporting Requirements

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

a. any daily record showing that the particulate filtration system was not in service when the emissions unit was in operation;

b. an identification of each day during which an inspection was not performed by the required frequency; and

c. an identification of each month of a 12-month rolling period in which the total organic HAP emissions were not reduced at least 60 percent by weight. The actual emissions and the percent reduction shall be calculated and reported for each such period.

If no deviations occurred during the reporting period, the permittee shall submit a quarterly report which states that no deviations occurred during that period.

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

(2) The permittee shall submit semiannual reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions.

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

(3) The permittee shall submit a semiannual compliance report that contains the relevant information and submitted on the stated dates as specified by paragraph (Q) of OAC rule 3745-21-25. If the semiannual compliance report required by the Title V permit includes all the information required by this rule, the report required by the Title V permit shall be deemed to satisfy any obligation for reporting for this rule.

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

(4) The permittee shall submit a semiannual compliance report that contains the relevant information and submitted on the stated dates as specified by paragraph (Q) of OAC rule 3745-21-25. If the semiannual compliance report required by the Title V permit includes all the information required for this rule, the report required by the Title V permit shall be deemed to satisfy any obligation for reporting for this rule.

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

(5) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart WWWW, per the following sections:

63.5900(b)	deviation reporting
63.5910(a)	table 14 - semi-annual compliance report
63.5910(b)	submittal date of reports in accordance with Table 14
63.5910(c)	content of compliance reports
63.5910(d)	submission of deviation reports
63.5910(f)	Submission of report if facility exceeds 100 tons HAP per year threshold.
63.5910(g)	Title V monitoring report allowance

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

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

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

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

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

4.9 pounds of VOC per hour.

Applicable Compliance Method:

This emission limit represents the potential to emit based on a worst case scenario and was developed based on the emission factor of 0.04 pound of VOC emissions per pound of resin (VOC content) (AP-42 Chapter 4.4, Table 4.4-2 (2/07)). This emission factor was multiplied by the maximum resin content (37.5% by weight) in the maximum throughput of 324 pounds of paste per hour.

As provided in OAC rule 3745-21-25(F)(3)(a), the permittee may use the cited emissions factor or may calculate the VOC emissions factor based on the equations inTable 1 to subpart WWWW of 40 CFR Part 63, or any VOC emissions factor approved by USEPA, such as emission factors or emission factor equations form AP-42, or site-specific VOC emissions factors if they are supported by VOC emissions test data. The organic HAP emissions factors in Table 1 of Subpart WWWW of 40 CFR Part 63 are equivalent to the VOC emissions factors for this requirement. The permittee shall notify the Ohio EPA (Toledo Division of Environmental Services) of any change in emission factors.

If required, the permittee shall demonstrate compliance with this emission limitation through testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents.

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

b. Emission Limitation:

1.07 pounds of PE per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1

through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

(Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1))

c. Emission Limitation:

0.02 pound of PE per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

(Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1))

d. Emission Limitation:

0.09 ton of PE per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable particulate emission limitation (0.02 pound per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

e. Emission Limitation:

VE shall not exceed 20% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method:

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

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

f. Emission Limitation:

Reduce total organic HAP emissions by at least 60 weight percent either on an individual basis or by averaging.

Applicable Compliance Method:

The permittee shall demonstrate compliance through one of the options as required pursuant to 40 CFR 63, Subpart WWWW, per the following sections: 63.5830 and 63.5850.

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

g) Miscellaneous Requirements

(1) None.