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

3/19/2013

Certified Mail

Mr. Bryan Kern
Style Crest Enterprises, Inc.
600 Hagerty Dr.
Fremont, OH 43420

Facility ID: 0372030210
Permit Number: P0112314
County: Sandusky

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

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA)Preliminary Proposed Title V permit that was issued in draft form on 2/14/2013. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

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

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

and

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

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

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA DAPC, Northwest District Office

Response to Comments

Facility ID:	0372030210
Facility Name:	Style Crest Enterprises, Inc.
Facility Description:	Manufacturing of vinyl siding and fiberglass steps for mobile homes
Facility Address:	600 Hagerty Dr. Fremont, OH 43420 Sandusky County
Permit:	P0112314, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Fremont News Messenger on 02/16/2013. The comment period ended on 03/18/2013.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

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

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

1. Topic: None

a. Comment: None

b. Response: None

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Style Crest Enterprises, Inc.

Facility ID:	0372030210
Permit Number:	P0112314
Permit Type:	Renewal
Issued:	3/19/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Style Crest Enterprises, Inc.

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Authorization

Facility ID:	0372030210
Facility Description:	Manufacturing of vinyl siding and fiberglass steps for mobile homes
Application Number(s):	A0046250, A0046747
Permit Number:	P0112314
Permit Description:	Renewal Title V operating permit for manufacturer of vinyl siding and fiberglass steps for mobile homes.
Permit Type:	Renewal
Issue Date:	3/19/2013
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0087656

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

Style Crest Enterprises, Inc.
600 Hagerty Dr.
Fremont, OH 43420

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

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

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

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

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

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

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

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

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive

measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

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

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the

insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

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

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northwest District Office.

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

3. Scheduled Maintenance

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

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

4. Risk Management Plans

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

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

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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

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

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

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

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

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

Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

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

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

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

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

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

8. Fees

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

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

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

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

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

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

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

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

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

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

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

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

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

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

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

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

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

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

(2) Compliance certifications shall include the following:

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

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

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

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

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

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

14. Permit Shield

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

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

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

15. Operational Flexibility

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

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

16. Emergencies

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

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

17. Off-Permit Changes

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

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

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

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

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

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

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

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

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

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

23. Title VI Provisions

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

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

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

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

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

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

The permittee shall submit required reports in the following manner:

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

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

25. Records Retention RequirementsUnder State Law Only

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

26. Inspections and Information Requests

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

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

27. Scheduled Maintenance/Malfunction Reporting

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

28. Permit Transfers

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

   a) None.

2. Pursuant to 40 CFR Part 64, the permittee has submitted, and the Ohio EPA has approved a compliance assurance monitoring plan for emissions units P013, P014 and P015 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

   [Authority for term: 40 CFR Part 64]

3. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18 and/or 3745-21:

EU ID	Operations, Property and/or Equipment Description
F001	PVC resin conveying and storage (PTI 03-6891)
P003	PVC grinder #2 (PTI 03-5440)
P005	PVC resin conveying and storage (PTI 03-5440)
P007	Rail welding booth (PTI 03-5440)
P008	PVC extrusion #1 (PTI 03-5440)
P009	PVC extrusion #2 (PTI 03-5440)
P010	PVC extrusion #3 (PTI 03-5440)
P011	PVC extrusion #4 (PTI 03-5440)

   [Authority for term: OAC rule 3745-77-07(A)(13)]

C. Emissions Unit Terms and Conditions

1. P001, Wood Saws

Operations, Property and/or Equipment Description:

Step shop wood saws with cyclone and baghouse

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 03-17237, issued 01/25/2007]	0.0032 grain (gr) particulate matter less than 10 microns in size (PM10)/dry standard cubic foot (dscf) 0.61 ton PM10/yr Visible particulate emissions (PE) shall not exceed 0% opacity, as a six-minute average from the baghouse stack. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-07(A)	See b)(2)c.
c.	OAC rule 3745-17-11(B)	See b)(2)d.

(2) Additional Terms and Conditions

a. The “Best Available Technology” (BAT) control requirements for this emissions unit has been determined to be the use of a baghouse achieving a maximum outlet concentration of 0.0032 gr PM10/dscf.

b. All PE emissions are assumed to be PM10.

c. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) 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. The total duration of any visible emissions incident; and

c. Any corrective action taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI 03-17237]

e) Reporting Requirements

(1) 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 eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI 03-17237]

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

[OAC rule 3745-15-03(A)]

f) Testing Requirements

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

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

0.0032 gr PM10/dscf

<u>Applicable Compliance Method</u>:

The gr/dscf emission limitation was established in accordance with the baghouse manufacturer's-guaranteed maximum outlet grain loading concentration.

If required, compliance with the PM10 limitation shall be determined in accordance with the test methods and procedures specified in Methods 201 and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

[OAC rule 3745-77-07(C)(1) and PTI 03-17237]

b. Emission Limitation:

0.61 ton PM10/yr

Applicable Compliance Method:

The annual emission limitation was established by multiplying the maximum baghouse outlet concentration of 0.0032 gr/dscf by the maximum volumetric air flow rate of 5000 acfm contributed from this emissions unit to the baghouse and using the following conversion factors in order to convert to tons per year; 1 lb/7000 gr, 60 min/hr, 8760 hrs/yr and 1 ton/2000 lbs. Therefore, provided compliance is shown with the 0.0032 gr PM10/dscf limitation, compliance with the annual emission limitation shall be demonstrated.

If required, demonstration of the maximum volumetric air flow rate shall be determined in accordance with the test methods and procedures specified in Methods 1-4 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI 03-17237]

c. Emission Limitation:

Visible PE shall not exceed 0% opacity, as a six-minute average from the baghouse stack.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in “Appendix on Test Methods” in 40 CFR, Part 60 (“Standards of Performance for New Stationary Sources”).

[OAC rule 3745-77-07(C)(1) and PTI 03-17237]

g) Miscellaneous Requirements

(1) None.

2. P801, Step Shop Cleaning Operations

Operations, Property and/or Equipment Description:

Facility-wide cleanup operations

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

(1) b)(1)b., d)(2), d)(3) and d)(4).

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 03-17067, issued 05/04/2006]	2856 lbs organic compounds (OC)/month; 17.14 tons OC/yr
b.	OAC rule 3745-114-04 ORC 3704.03(F)	See d)(2) through d)(4)

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for cleanup material usage in this emissions unit:

a. The company identification for each cleanup material employed;

b. The number of gallons of each cleanup material employed;

c. The OC content, in pounds per gallon, for each cleanup material employed;

d. The OC emission rate for each cleanup material employed, in pounds per month [d)(1)b. x d)(1)c.];

e. The total OC emission rate for all coating materials employed, in pounds per month [the summation of d)(1)e.]; and

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions form cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) – (total gallons cleanup material sent off-site for disposal or reclamation (minus solids content of said material) x solvent density.

f. The annual, year to date, OC emissions, in tons, from all cleanup materials employed [the summation of d)(1)e. for each month to date from January to December).

[OAC rule 3745-77-07(C)(1) and PTI 03-17067]

(2) The permit-to-install (PTI) for emissions unit P801 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the PTI application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the PTI application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: Acetone

TLV (mg/m3): 1187

Maximum Hourly Emission Rate (lb/hr): 11.9

Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 1780

MAGLC (ug/m3): 28262

[PTI 03-17067]

(3) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most

recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

[PTI 03-17067]

(4) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing PTI will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final PTI prior to the change.

The permittee shall collect record and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[PTI 03-17067]

e) Reporting Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 03-17067, issued on 5/4/2006: [e)(2) and (3)]. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall submit quarterly deviation (excursion) reports which identify any exceedances of the monthly OC emission limitation contained in b)(1). These reports shall be in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1)]

(3) The permittee shall submit annual reports that summarize the total annual actual OC emissions from cleanup operations. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI 03-17067]

(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.

[OAC rule 3745-15-03(A)]

f) Testing Requirements

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

a. Emission Limitations:

2856 lbs OC/month; 17.14 tons OC/yr

Applicable Compliance Method:

Compliance with the monthly and annual OC emission limitations shall be based upon the record keeping requirements specified in d)(1) of this permit.

Also, the annual OC emission limitation was established based on multiplying the monthly OC limitation by 12, and then dividing by 2000. Therefore, as long as compliance with the monthly limitation is maintained, compliance with the annual limitation shall be assumed.

[OAC rule 3745-77-07(C)(1) and PTI 03-17067]

g) Miscellaneous Requirements

(1) None.

3. R001, Resin Spray Unit #1

Operations, Property and/or Equipment Description:

fiberglass/resin and gelcoat spray operation

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 P0110900, issued 10/10/2012]	11.5 lbs organic compounds (OC)/hr; 50.5 tons OC/yr See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-11(C)	See b)(2)c.
c.	40 CFR, Part 63, Subpart WWWW (63.5780-63.5935)	See 40 CFR Part 63.5805 See b)(2)d., c)(3), d)(7) and e)(3)
d.	40 CFR Part 63.1-15 (40 CFR 63.5925)	Table 15 of Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions of Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1-15 apply

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(C) and 40 CFR, Part 63, Subpart WWWW.

b. The hourly OC emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with this emission limitation.

c. The permittee shall operate a dry particulate filter system whenever this emissions unit is in operation.

d. The permittee shall comply with the emission limitation for this emissions unit by using the following compliance option:

63.5810 – option for meeting the standards for open molding and centrifugal casting operations at new and existing sources.

c) Operational Restrictions

(1) The permittee shall operate and maintain the dry filter system for the surface coating operations in accordance with the manufacturer's recommendations, instructions and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry filter control shall be employed during all periods of coating application to control particulate emissions.

[OAC rule 3745-77-07(A)(1) and PTI P0110900]

(2) The permittee shall expeditiously repair the dry filter system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-77-07(A)(1) and PTI P0110900]

(3) The permittee shall comply with the application restrictions required pursuant to 40 CFR, Part 63, Subpart WWWW, per the following sections:

a. 63.5835(a) – work practice standards.

b. 63.5835(c) – the permittee must always operate and maintain the affected source, including the air pollution control and monitoring equipment, according to the provisions in 63.6(e)(1)(i).

[OAC rule 3745-77-07(A)(1), PTI P0110900 and 40 CFR, Part 63, Subpart WWWW]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emissions unit:

a. The company identification for each polyester resin, catalyst and gelcoat employed;

b. The amount of each polyester resin, catalyst and gelcoat employed, in pounds;

c. The total amount of all the polyester resins, catalysts and gelcoat employed, in pounds [the summation of d)(1)b. for all polyester resins, the summation of d)(1)b. for all catalysts and the summation of d)(1)b. for all gelcoat];

d. The OC content, in percent by weight, of each polyester resin, catalyst and gelcoat employed;

e. The OC emission rate for each polyester resin employed [d)(1)b. x d)(1)d. x UEF polyester resin factor*], in pounds;

f. The OC emission rate for each catalyst employed [d)(1)b. x d)(1)d. x UEF catalyst factor*], in pounds;

g. The OC emission rate for each gelcoat employed [d)(1)b. x d)(1)d. x UEF gelcoat factor*], in pounds;

h. The total OC emission rate for all the polyester resins, catalysts and gelcoat employed, in pounds [the summation of d)(1)e. for all polyester resin + the summation of d)(1)f. for all catalysts + the summation of d)(1)g. for all gelcoat]; and

i. The annual year-to-date OC emissions, in tons, for all polyester resins, catalysts and gelcoat employed [the summation of d)(1)h. for each calendar month to date from January to December divided by 2000 lbs/ton.]

*Technical Discussion of the Unified Emission Factors for the Open Molding of Composites April 7, 1999 and Emission Factors for Liquid Organic Peroxide Catalysts used in the Open Molding of Composites, March 24, 1999.

[OAC rule 3745-77-07(C)(1) and PTI P0110900]

(2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions or operating manuals for the dry filter control system, 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.

[OAC rule 3745-77-07(C)(1) and PTI P0110900]

(3) The permittee shall conduct periodic inspections of the dry filter control 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.

[OAC rule 3745-77-07(C)(1) and PTI P0110900]

(4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry filter control 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.

[OAC rule 3745-77-07(C)(1) and PTI P0110900]

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

a. The date of the inspection;

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

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

d. The name of the person who performed the inspection.

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

[OAC rule 3745-77-07(C)(1) and PTI P0110900]

(6) The permittee shall maintain records that document any time periods when the dry filter control was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry filter control 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.

[OAC rule 3745-77-07(C)(1) and PTI P0110900]

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

a. 63.5895 – monitoring and collection of data to demonstrate continuous compliance

b. 63.5900 – demonstration of continuous compliance with the standards

c. 63.5915 – records that must be kept

d. 63.5920 – format length that records must be kept.

[OAC rule 3745-77-07(C)(1), PTI P0110900 and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI P0110900]

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

a. Any daily records showing that the dry filter control 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.

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

[OAC rule 3745-77-07(C)(1) and PTI P0110900]

(3) The permittee shall submit reports and such other notifications to the appropriate Ohio EPA District Office or local air agency as required by 40 CFR, Part 63, Subpart WWWW, including the following sections:

a. 63.5905 – what notifications must be submitted and when

b. 63.5910 – what reports must be submitted and when.

[OAC rule 3745-77-07(C)(1), PTI P0110900 and 40 CFR, Part 63, Subpart WWWW]

(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.

[OAC rule 3745-15-03(A)]

f) Testing Requirements

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

a. <u>Emission Limitations</u>:

11.5 lbs OC/hr; 50.5 tons OC/yr

<u>Applicable Compliance Method</u>:

The hourly OC emission limitation represents the potential to emit* for this emissions unit. Therefore, no monitoring, record keeping or reporting requirements are necessary to demonstrate compliance with this emission limitation.

*The potential to emit was determined by adding the OC emissions from the polyester resin, catalyst and gelcoat. The OC emissions were calculated by multiplying the OC content by a maximum usage rate and then applying the appropriate UEF emission factor.

The annual OC emission limitation was determined by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/ton.

Also compliance with the annual emission limitation shall be based upon the record keeping requirements specified in d)(1).

If required, compliance with the hourly OC emission limitation shall be demonstrated based on Methods 1 – 4 and 18, 25, or 25a, as appropriate, of 3=40 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI P0110900]

b. Emission Limitation:

Limitation established pursuant to 40 CFR 63.5805

Applicable Compliance Method:

The permittee shall comply with the emission limitation for this emissions unit by using the following compliance option: 63.5810 – option for meeting the standards for open molding and centrifugal casting operations at new and existing sources.

[OAC rule 3745-77-07(C)(1), PTI P0110900 and 40 CFR, Part 63, Subpart WWWW]

(2) Formulation data or US EPA Method 24 shall be used to determine the OC contents of all polyester resins, catalyst and gelcoat materials.

[OAC rule 3745-77-07(C)(1) and PTI P0110900]

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group -PVC Pulverizers and Grinders: P013, P014, P015

EU ID	Operations, Property and/or Equipment Description
P013	PVC pulverizer mill no.9 with baghouse
P014	PVC pulverizer Mill no.10 with baghouse
P015	Grinder system mill no.5 with baghouse

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 03-17237, issued 01/25/2007]	0.02 grain (gr) particulate matter less than 10 microns in size (PM10)/dry standard cubic foot (dscf) from each emissions unit P013-P015, individually 3.77 tons PM10/yr from each emissions unit P013-P015, individually Visible particulate emissions (PE) shall not exceed 0% opacity, as a six-minute average from the baghouse stacks serving these emissions units. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-07(A)	See b)(2)c.
c.	OAC rule 3745-17-11(B)	See b)(2)d.
d.	40 CFR 64 – Compliance Assurance Monitoring (CAM)	See d)(1) through d)(5), e)(1) and e)(2).

(2) Additional Terms and Conditions

a. All PE are assumed to be PM10.

b. The “Best Available Technology” (BAT) control requirements for each emissions unit P013-P015, individually have been determined to be the use of a baghouse achieving a maximum outlet concentration of 0.02 gr PM10/dscf.

c. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for the baghouse controlling these emissions units are visible emissions checks specified in d)(3), pressure drop requirements specified in d)(4) and annual inspection of the baghouse and cyclone specified in d)(5).

When the performance indicators show operation outside the normal or usual manner of operation, the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(2) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(3) The permittee shall perform daily checks, when each emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving each 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. The total duration of any visible emissions incident; and

c. Any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1), PTI 03-17237 and 40 CFR Part 64]

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

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

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

e. the findings and recommendations.

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

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

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

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

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

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

The acceptable range established for the pressure drop across the baghouse is between 2 to 7 inches of water.

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

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(5) Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee also has an inspection and maintenance program for the baghouse and cyclone, including but not limited to:

a. annual preventive maintenance inspections of process equipment and cyclone and baghouse control devices.

Based on the results of the monitoring and inspection program, repairs to the baghouse and cyclone shall be made as needed. If the current CAM indicators and/or the baghouse and cyclone inspection program are considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC 3745-77-07(C)(1) and 40 CFR Part 64]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify

a. all days during which any visible particulate emissions were observed from any stack serving these emissions units; and

b. describe any corrective actions taken to eliminate visible particulate emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1), PTI 03-17237 and 40 CFR Part 64]

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

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

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

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

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

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

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

[OAC 3745-77-07(C)(1) and 40 CFR Part 64]

(3) 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.

[OAC rule 3745-15-03(A)]

f) Testing Requirements

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

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

0.02 gr PM10/dscffrom each emissions unit P013-P015, individually

<u>Applicable Compliance Method</u>:

This gr/dscf emission limitation was established in accordance with the baghouse manufacturer's-guaranteed maximum outlet grain loading concentration.

If required, compliance with the PM10 limitation shall be determined in accordance with the test methods and procedures specified in Method 201 and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

[OAC rule 3745-77-07(C)(1) and PTI 03-17237]

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

3.77 tons PM10/yr from each emissions unit P013-P015, individually

Applicable Compliance Method:

The annual emission limitation was established by multiplying the maximum baghouse outlet concentration of 0.02 gr/dscf by the maximum volumetric air flow rate of 5000 acfm contributed from this emissions unit to the baghouse and using the following conversion factors in order to convert to tons per year; 1 lb/7000 gr, 60 min/hr, 8760 hrs/yr and 1 ton/2000 lbs. Therefore, provided compliance is shown with the 0.02 gr PM10/dscf limitation, compliance with the annual emission limitation shall be demonstrated.

If required, demonstration of the maximum volumetric air flow rate shall be determined in accordance with the test methods and procedures specified in Methods 1-4 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI 03-17237]

c. Emission Limitation:

Visible PE shall not exceed 0% opacity, as a six-minute average from the baghouse stacks serving these emissions units.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in “Appendix on Test Methods” in 40 CFR, Part 60 (“Standards of Performance for New Stationary Sources”).

[OAC rule 3745-77-07(C)(1) and PTI 03-17237]

g) Miscellaneous Requirements

(1) None.