



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

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Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

12/22/06

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

02-04-03-0456
Hadlock Plastics Corp. Plant 3
Jerry Lillie Mr
Hadlock Plastics Inc. 110 North Eagle St
Geneva, OH 44041

Dear Jerry Lillie:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Northeast District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled. **In order to facilitate our review of all the comments or concerns you may have with the enclosed draft permit, please provide a hand marked-up copy of the draft permit showing the changes you think are necessary, along with any additional summary comments, by the end of the draft public comment period. The hard marked-up copy and any additional summary comments should be submitted to the Ohio EPA District Office or local air agency identified below and to the following address:**

**Andrew Hall
Permit Review/Development Section
Ohio EPA, Division of Air Pollution Control
122 South Front Street
Columbus, Ohio 43215**

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions concerning this draft Title V permit, please contact Northeast District Office.

Sincerely,

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

cc: USEPA (electronically submitted)
File, DAPC PIER
Northeast District Office
Pennsylvania



State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 12/22/06	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
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This document constitutes issuance of a Title V permit for Facility ID: 02-04-03-0456 to:
 Hadlock Plastics Corp. Plant 3
 214 North Cedar St
 Geneva, OH 44041

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

P101 (Resin Transfer Molding) Resin Transfer Molding using polyester resins	R101 (Tooling and Gelcoat Booth) Tooling and Gelcoat booth for the application of polyester resins
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You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. 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. 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, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Joseph P. Koncelik
 Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. 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 A.III of Part III of this Title V permit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
(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:

i. **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 General Term and Condition A.1.c.ii 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) constitutes a violation of an emission limitation (or control requirement) and, therefore, 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))

- ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II 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 General 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 General Term and Condition.

See B.6 below if no deviations occurred during the quarter.

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

- iii. **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 General Term and Condition A.1.c.ii 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; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii 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 Part II.A 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 General Term and Condition A.1.c.ii 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))

- iv. 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))

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

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

2. 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 General Term and Condition A.1.c.i above.

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

3. 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))

4. Title IV Provisions

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

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

5. Severability Clause

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

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and 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 A.10 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 upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:
 - i. 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
 - ii. 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
 - iii. a combination of i. and ii. above.

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))

7. Fees

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

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

8. 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))

9. 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 general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. 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))

11. 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))

12. 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:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- 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:
- i. 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.
 - ii. 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.
 - iii. 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))

13. 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))

14. 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))

15. 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))

16. 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))

17. 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.)

18. 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))

19. 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))

20. 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))

21. 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)

22. 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))

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

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.)

2. Records Retention Requirements

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.

3. 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.

4. 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).

5. 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.

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

If no 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 General Term and Condition A.1.c.ii; 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.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. Hadlock Plastics Corporation, facility ID 02 04 03 0272, and Hadlock Plastics Corporation Plant 3, facility ID 02 04 03 0456, are one facility for permitting purposes.
2. The following emissions units located at this facility are subject to 40 CFR Part 63, Subpart WWWW-- National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production:

P101 - resin transfer molding; and
R101 - tooling and gelcoat booth.

[Authority for term: 40 CFR 63.5800, Table 2 of 40 CFR Part 63, Subpart WWWW and OAC rule 3745-31-05 (A)(3)]

REQUIREMENTS

3. 40 CFR Part 63, Subpart A - General Provisions Applicability to 40 CFR Part 63, Subpart WWWW

The permittee is subject to the following requirements specified in 40 CFR Part 63, Subpart A as listed in Table 15 of 40 CFR Part 63, Subpart WWWW:

Parts 63.1 (a)(1)-(4), 63.1(a)(6), 63.1 (a)(10)-(14), 63.1(b)(1), 63.1 (b)(3), 63.1 (c)(1) and (2), 63.1 (c)(5), 63.1 (e), 63.2, 63.3, 63.4, 63.5 (a)(1) and (2), 63.5(b)(1), 63.5(b)(3) and (4), 63.5 (b)(6), 63.5 (d)(1) and (2), 63.5 (d)(4), 63.5 (e)(1) - (5), 63.5 (f)(1) and (2), 63.6 (a)(1) and (2), 63.6 (b)(1)-(5), 63.6 (b)(7), 63.6 (c)(1) and (2), 63.6 (c)(5), 63.6 (e)(1) - (3), 63.6 (f)(2) and (3), 63.6 (g)(1) - (3), 63.6 (i)(1)-(14), 63.6 (i)(16), 63.6 (j), 63.7 (a)(1), 63.7 (a)(3), 63.7 (b)(1) and (2), 63.7 (c), 63.7 (d), 63.7(e), 63.7 (f), 63.7 (g), 63.7 (h), 63.8 (a)(1) and (2), 63.8 (a)(4), 63.8 (b)(1) - (3), 63.8 (c)(1) - (4), 63.8 (c)(6) - (8), 63.8 (d), 63.8 (e)(1) - (4), 63.8 (e)(5)(i), 63.8 (f)(1) - (6), 63.8 (g)(1) - (5), 63.9 (a)(1)-(4), 63.9 (b)(1) and (2), 63.9 (b)(4)(i), 63.9 (b)(4)(v), 63.9 (b)(5), 63.9(c), 63.9 (d), 63.9 (e), 63.9 (g)(1), 63.9 (g)(3), 63.9 (h)(1) - (3), 63.9 (h)(5) and (6), 63.9 (i), 63.9(j), 63.10 (a), 63.10 (b)(1), 63.10 (b)(2)(i) - (xiv), 63.10 (b)(3), 63.10 (c)(1), 63.10 (c)(5) - (8), 63.10 (c)(10) - (15), 63.10 (d)(1) and (2), 63.10 (d)(4) and (5), 63.10 (e)(1) - (3), 63.10 (f), 63.11, 63.12, 63.13, 63.14, and 63.15.

The following emissions units are subject to the aforementioned requirements: P101 and R101.

4. The permittee shall comply with the work practice standard to not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.

[Authority for term: 40 CFR 63.5835 and Table 4 of 40 CFR Part 63, Subpart WWWW]

5. The permittee shall comply with the work practice standard to keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

[Authority for term: 40 CFR 63.5835 and Table 4 of 40 CFR Part 63, Subpart WWWW]

6. The following operations are specifically excluded from any requirements in 40 CFR Part 63, Subpart WWWW: application of mold sealing and release agents, mold stripping and cleaning, repair of parts not manufactured at this facility, non-gel coat surface coatings, application of putties, polyputties and adhesives, repair or production materials that do not contain resin or gel coat, and research and development operations as defined in section 112(c)(7) of the Clean Air Act.

[Authority for term: 40 CFR 63.5790(c)]

MONITORING AND RECORD KEEPING

A. State and Federally Enforceable Section (continued)

7. The permittee shall maintain records which identify each HAP in each cleaning solvent employed. If any cleaning solvent contains styrene, the specific application shall also be documented (for example, the cleaning solvent is used only in the closed cleaning system employed at P005).

[Authority for term: 40 CFR 63.63.5835 and Table 4 of 40 CFR Part 63, Subpart WWWW]

8. The permittee shall maintain records which document any time containers that store HAP containing materials were not kept closed or covered except during the addition or removal of materials. The records shall indicate how long the containers were not properly closed or covered and any actions taken to prevent a reoccurrence.

[Authority for term: 40 CFR 63.5935 and Table 4 of 40 CFR Part 63, Subpart WWWW]

9. In order to determine the organic HAP content of resins and gel coats, information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS) may be relied upon, using the procedures specified below.

a. Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds.

b. If the organic HAP content is provided by the material supplier or manufacturer as a range, use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of appendix A to 40 CFR part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then use the measured organic HAP content to determine compliance.

c. If the organic HAP content is provided as a single value, use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then use the measured organic HAP content to determine compliance

[Authority for term: 40 CFR 63.5797]

10. The permittee must maintain a copy of each notification and report submitted to comply with subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted.

A record of all data, assumptions and calculations used to determine organic HAP emissions factors for operations listed in Table 3 must be retained.

A certified statement of compliance with the work practice requirements must be maintained.

[Authority for term: 40 CFR 63.5915]

11. All applicable records must be maintained in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1). The permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The records may be kept offsite for the remaining 3 years. Records may be kept in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

[Authority for term: 40 CFR 63.5920]

A. State and Federally Enforceable Section (continued)

12. The permittee must maintain a copy of each notification and report submitted to comply with subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted.

A record of all data, assumptions and calculations used to determine organic HAP emissions factors for operations listed in Table 3 must be retained.

A certified statement of compliance with the work practice requirements must be maintained.

[Authority for term: 40 CFR 63.5915]

REPORTS AND NOTIFICATIONS

13. The permittee submitted an Initial Notification on May 13, 2002. If there is a change in any information submitted in the Initial Notification, the permittee must submit the changes in writing to the Administrator within 15 calendar days after the change.

[Authority for term: 40 CFR 63.5905 (b)]

14. If there is a change in any information submitted in any notification, the change must be submitted in writing to the Administrator within 15 calendar days after the change.

[Authority for term: 40 CFR 63.5905 (b)]

COMPLIANCE AND TESTING

15. Initial Compliance Demonstration

a. For the work practice standard that the permittee not use cleaning solvents that contain HAP, as detailed in Part II, section A.4, the permittee has demonstrated initial compliance if a certified statement is included in the notice of compliance status that all cleaning materials, except styrene contained in closed systems, or materials used to clean cured resin from application equipment contain no HAP.

b. For the work practice standard the permittee keep containers that store HAP-containing materials closed or covered as detailed in Part II, section A.5, the permittee has demonstrated initial compliance if a certified statement is included in the notice of compliance status that all HAP-containing storage containers are kept closed or covered except when adding or removing materials, and that any bulk storage tanks are vented only as necessary for safety.

[Authority for term: 40 CFR 63.5860(a) and Table 9 of 40 CFR Part 63, Subpart WWWW]

B. State Only Enforceable Section

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Resin Transfer Molding (P101)
Activity Description: Resin Transfer Molding using polyester resins

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P101 is a resin transfer molding (RTM) operation. [Note: RTM means a process for manufacturing composites whereby catalyzed resin is transferred or injected into a closed mold in which fiberglass reinforcement has been placed.]	OAC rule 3745-31-05(A)(3) (PTI 02-20534)	Organic compounds (OC) emissions shall not exceed 8 lbs per hour, 40 lbs per day and 7.3 tons per year from the RTM operation. OC emissions shall not exceed 667 lbs per month and 4.0 tons per year from cleanup. See section A.II.1 below. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW.
	40 CFR Part 63, Subpart WWWW	See Part II, sections A.2 through A.15.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The only organic material employed for cleanup shall be acetone.
 [Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-20534]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect the following records each day from the RTM process:
 - a. the identification of each organic material employed;
 - b. the OC content of each organic material, in lbs/gal;
 - c. the amount, in gallons, of each such organic material employed;
 - d. the pounds of available OC, in pounds per day, calculated as (b) x (c);
 - e. the pounds of OC emitted per day, calculated as (d) x (emission factor of 2%);
 - f. the number of hours of operation; and
 - g. the average hourly emissions, calculated as (e) / (f).

[Note: Emission factor of 2% is taken from Table 5.2 from AP-42, Average Emission Estimation Equations by Process. 40 CFR 63.5799(a) states emission factors from AP-42 may be used.]

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20534]

2. The permittee shall collect the following records each month from cleanup operations:
 - a. the identification of each organic material employed for cleanup;
 - b. the OC content of each organic cleanup material, in pounds per gallon;
 - c. the number of gallons of each organic cleanup material employed; and
 - d. the emissions from cleanup, in pounds OC per month, calculated as the sum of (b) x (c) for each organic material employed.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20534]

IV. Reporting Requirements

1. The following quarterly deviation reports shall be submitted as required by the General Terms and Conditions contained in this permit, by April 30, July 31, October 31, and January 31, and shall cover the records of the previous calendar quarter:
 - a. the permittee shall submit written quarterly deviation (excursion) reports that include an identification of each day during which the average OC emissions from the RTM process exceeded 8 pounds per hour, and the actual OC emissions for each such hour;
 - b. the permittee shall submit written quarterly deviation (excursion) reports that include an identification of each day during which the OC emissions from the RTM process exceeded 40 pounds, and the actual OC emissions for each such day;
 - c. the permittee shall submit written quarterly deviation (excursion) reports that include an identification of each month during which the OC emissions from cleanup exceeded 667 pounds, and the actual OC emissions from cleanup for each such day; and
 - d. the permittee shall submit written quarterly deviation (excursion) reports that include an identification of each day during which an organic material other than acetone was employed, and the actual OC emissions for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20534]

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

8 lbs per hour of OC from the RTM process

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.g.

1.b Emission Limitation:

40 lbs per day of OC from the RTM process

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.d.

1.c Emission Limitation:

7.3 tons per year of OC from the RTM process

Applicable Compliance Method:

Compliance shall be demonstrated by summing the calculated daily emissions, based upon the record keeping requirements specified in section A.III.1.d for each calendar year, and then dividing by 2000 lbs/ton.

1.d Emission Limitation:

667 lbs per month of OC from cleanup

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2.d.

1.e Emission Limitation:

4.0 tons per year of OC from cleanup

Applicable Compliance Method:

Compliance shall be demonstrated by summing the calculated monthly emissions as specified in section A.III.2.d for each calendar year, and then dividing by 2000 lbs/ton.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20534]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Tooling and Gelcoat Booth (R101)

Activity Description: Tooling and Gelcoat booth for the application of polyester resins

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R101 is a tooling and gel coat booth	OAC rule 3745-31-05(A)(3) (PTI 02-20427)	Organic compounds (OC) emissions shall not exceed 7.3 tons per year from tooling and gel coat. OC emissions shall not exceed 366 lbs per month and 2.2 tpy from cleanup. See section A.II.1 below.
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs per hour and 40 lbs per day from tooling and gel coat.
	40 CFR Part 63, Subpart WWWW	See Part II, sections A.2 through A.15 and Part III, section A.I.2.a.

2. Additional Terms and Conditions

- 2.a The permittee shall comply with the organic hazardous air pollutant (HAP) emission limitations in Table 3 in 40 CFR Part 63, Subpart WWWW which is included in the text of Attachment 1 hereto, and is hereby incorporated into this term as if fully rewritten, or to the most recent update to Table 3 in 40 CFR Part 63, Subpart WWWW.

[Authority for term: 40 CFR 63.5805(b) and PTI 02-20427]

II. Operational Restrictions

1. Acetone shall be the only OC material employed for cleanup.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-20427]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect the following information each day;
 - a. the name and identification of each resin, gel coat and cleanup material employed;
 - b. the OC (HAP) content, in percent by weight, for each resin, gel coat and cleanup material;
 - c. the amount of each neat resin, neat gel coat and cleanup material employed, in gallons;
 - d. the weight of any OC added to the neat resins/gel coats, in lbs;
 - e. the time period, in hours, over which each resin and gel coat was employed;
 - f. determine the emission factor for each resin and gel coat in each process stream, using Table 1 in 40 CFR Part 63, Subpart WWWW which is included in the text of Attachment 1 hereto, and is hereby incorporated into this term as if fully rewritten, or the most recent update to Table 1 in 40 CFR Part 63, Subpart WWWW;
 - g. the styrene emissions for each neat resin and neat gel coat in each process stream, in lbs/day, calculated using the emission factor(s) calculated in section A.III.1.f and the neat resin and neat gel coat usage in section A.III.1.c;
 - h. the total daily OC emissions from the tooling and gel coat operation, calculated as the sum of emissions from each process stream calculated in section A.III.1.g plus the emissions calculated from OC added in section A.III.1.d;
 - i. the emissions, in lbs/hour, for all resins and gel coats employed (calculated as A.III.1.h./A.III.1.e.); and
 - j. the daily emissions from cleanup (calculated as A.III.1.b x A.III.1.c).

Note: All OC employed in the resins and gel coats are also HAP.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20427]

2. The permittee shall collect the following information each month;
 - a. the monthly OC emissions from cleanup, calculated by summing the daily emissions determined in section A.III.1.j.

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

3. The permittee shall collect and keep records of resin and gel coat use, organic HAP content and operation where the resin is used. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier.

[Authority for term: 40 CFR 63.5895(c) and PTI 02-20427]

4. If the permittee initially demonstrates that all resins and gel coats individually meet the applicable organic HAP emission limitation, or organic HAP content limits, the resin and gel coat use records are not required. However, the permittee must include a statement in each compliance report that all resins and gel coats still meet the organic HAP limits for compliant resins and gel coats. If after this initial demonstration, the permittee changes to a higher organic HAP resin or gel coat, or increases the resin or gel coat organic HAP content, or changes to a higher-emitting resin or gel coat application method, the permittee must either again demonstrate that all resins and gel coats still meet the applicable organic HAP emission limitations, or begin collecting resin and gel coat use records and calculate compliance on a rolling, 12-month average.

[Authority for term: 40 CFR 63.5895(d) and PTI 02-20427]

IV. Reporting Requirements

1. The following quarterly deviation reports shall be submitted as required by the General Terms and Conditions contained in this permit, by April 30, July 31, October 31 and January 31, and shall cover the records of the previous calendar quarter.
 - a. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the average hourly OC emission rate from the tooling and gel coat operation exceeded 8 pounds per hour, and the actual average hourly OC emission rate for each such day.
 - b. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the total OC emission rate from the tooling and gel coat operation exceeded 40 pounds per day, and the actual OC emission rate for each such day.
 - c. The permittee shall submit deviation (excursion) reports that include an identification of each month during which the total OC emission rate from cleanup exceeded 366 pounds per month, and the actual OC emission rate for each such month.

If no deviations occurred during any such calendar quarter, a report indicating no deviations shall be sent.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20427]

2. The permittee must submit semiannual compliance reports.
 - a. The first compliance report must cover the period beginning on April 21, 2006, and ending on December 31, 2006. The first compliance report must be postmarked or delivered no later than January 31, 2007.
 - b. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. Each semiannual compliance report shall be postmarked or delivered no later than January 31 and July 31, whichever date is the first date following the end of the semiannual reporting period.

[Authority for term: 40 CFR 63.5910 and PTI 02-20427]

3. Each semiannual compliance report must contain the following information.
 - a. The company name and address.
 - b. A statement by a responsible official with that official's name, title and signature, certifying the truth, accuracy and completeness of the content of the report.
 - c. The date of the report and the beginning and ending dates of the reporting period.
 - d. If there are no deviations from any organic HAP emission limit and from any work practice standards in this subpart, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.
 - e. For each deviation from any organic HAP emission limit and for each deviation from the requirements for work practice standards, the compliance report must contain the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken; and
 - f. If the facility has exceeded the 100 tpy organic HAP emissions threshold if that exceedance would make the facility subpart to 63.5805(a)(1) or (d). Include with this report any request for an exemption under 63.5805(e). If an exemption was received under 63.5805(e) and subsequently exceed the 100 tpy organic HAP emissions threshold, this exceedance must be reported as required in 63.5805(f).

[Authority for term: 40 CFR 63.5910 and PTI 02-20427]

IV. Reporting Requirements (continued)

4. Each affected source that has obtained a Title V operating permit pursuant to 40 CFR Part 70 or 71 must report all deviations as defined in 40 CFR Part 63, Subpart WWWW in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 of 40 CFR Part 63, Subpart WWWW, along with, or as part of, the semiannual monitoring report required by 40 CFR Part 70.6(a)(3)(iii)(A) or 40 CFR Part 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in 40 CFR Part 63, Subpart WWWW, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

[Authority for term: 40 CFR Part 63.5910(g) and PTI 02-20427]

V. Testing Requirements

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

- 1.a Emission Limitation:

8 lbs per hour of OC from the tooling and gel coat operation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.i.

- 1.b Emission Limitation:

40 lbs per day of OC from the tooling and gel coat operation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.h.

- 1.c Emission Limitation:

7.3 tons per year of OC from the tooling and gel coat operation

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily emissions, as calculated in section A.III.1.h, for the calendar year, and then dividing by 2000 lbs per ton.

- 1.d Emission Limitation:

366 lbs per month of OC from cleanup

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section A.III.2.a.

- 1.e Emission Limitation:

2.2 tons per year of OC from cleanup

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly OC emissions from cleanup, as calculated in section A.III.2.a, for the calendar year, and then dividing by 2000 lbs per ton.

V. Testing Requirements (continued)

2. To demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 of 40 CFR Part 63, Subpart WWWW follow the instructions below.
 - a. Calculate the actual organic HAP emission factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique or the control technique. Calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 in 40 CFR Part 63, Subpart WWWW attached to this permit or the most recent update to Table 1 in 40 CFR Part 63, Subpart WWWW for open molding or site-specific organic HAP emission factors discussed in 40 CFR 63.5796. The emission factor calculation should include any and all emission reduction techniques used. If using vapor suppressants to reduce HAP emissions, determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in Appendix A to Subpart WWWW of 40 CFR Part 63.
 - b. If the calculated emission factor is less than or equal to the appropriate emission limitation, compliance with the emission limitation in Table 3 has been demonstrated.

[Authority for term: 40 CFR 63.5810(a) and PTI 02-20427]

VI. Miscellaneous Requirements

1. The following definitions apply to terms used in this permit.

Neat gel coat means the gel coat as purchased from the supplier, but not including any inert fillers.

Neat gel coat plus means the neat gel coat plus any organic HAP-containing materials that are added to the gel coat by the supplier or the facility, including catalysts and promoters. Neat gel coat plus does include any additions of styrene or methyl methacrylate monomer in any form, including in catalysts and promoters.

Neat resin means the resin as purchased from the supplier, but not including any inert fillers.

Neat resin plus means neat resin plus any organic HAP-containing materials that are added to the resin by the supplier or the facility. Neat resin plus does not include any added filler, reinforcements, catalysts or promoters. Neat resin plus does include any additions of styrene or methyl methacrylate monomer in any form, including in catalysts and promoters.

[Authority for term: 40 CFR 63.5935]

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

THIS IS THE LAST PAGE OF THE PERMIT

Statement of Basis For Title V Permit

Part I - General	
Company Name	Hadlock, Inc.
Premise Number	02 04 03 0456
What makes this facility a Title V facility?	Major for HAP emissions
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	There are none at this facility.
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)	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 that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	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 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)	This is a first issue TV permit.

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (374 5-)	Other	
Part II A.2-15	N	40 CFR 63, Subpart WWW W	

C

Instructions for Part II:

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)															
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.															
EU(s)	Limitation	Basis		N D	O R	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P101	8 lbs OC/hour, 40 lbs /day and 7.3 tpy	31-05 (A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Compliance is based upon monitoring and record keeping requirements (emissions calculations).
P101, R101	see comment	31-05 (A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	Use only acetone for cleanup ET - Compliance is based upon monitoring and record keeping requirements

P101	see comment	N	40 CFR 63 WWWW	N	N	Y	N	N	Y	N	Y	N	N	N	Work practice requirements as specified in MACT
R101	7.3 tons OC/year; 366 lbs OC per month and 2.2 tpy from cleanup	31-05 (A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Compliance is based upon monitoring and record keeping requirements (emissions calculations).
R101	8 lbs OC/hour, 40 lbs /day	21-07 (G)(2)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Compliance is based upon monitoring and record keeping requirements (emissions calculations).
R101	see comment	N	40 CFR 63 WWWW	N	N	Y	N	N	Y	N	Y	N	N	N	Applicable organic HAP limit for open molding from Table 3; ET - calculations as required in MACT using emission factor calcs in Table 1

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

C Instructions for Part III:

C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.

C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.

- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R,"

“Rp,” and “ET” columns, if “N” is specified, there should be a brief explanation in the “Comments” section as to why there are no requirements. If a brief explanation is provided in the “Comments” section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the “Comments” section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the “Monitoring,” “Record Keeping,” or “Reporting” requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the “Monitoring,” “Record Keeping,” or “Reporting” requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the “Comments” section would be sufficient.

Also, if a “Y” is noted under “OR,” “Misc,” “St,” “ND,” or “ENF” an explanation of the requirements must be provided in the “Comments” section. In addition to a general explanation of the “OR,” “Misc,” “St,” “ND,” and/or “ENF” the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
3. If the “ND” column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the “ENF” column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an “N” is noted in the “OR,” “Misc,” “St,” “ND,” or “ENF” columns.

- C **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the “N/A” in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the “Comments” area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain “N/A” when developing the SOB during the initial permit development. Note: APA’s and Off-permit changes do not need to be noted in the SOB.

Table 1 to Subpart WWWW of Part 63--Equations to Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams

As specified in 40 CFR 63.5810, use the equations in the following table to calculate organic HAP emission factors for specific open molding and centrifugal casting process streams.

If your operation type is a new or existing. . .	And you use. . .	With. . .	Use this organic HAP Emissions Factor (EF) Equation for materials with less than 33 percent organic HAP (19 percent organic HAP for nonatomized gel coat) ¹²³ . . .	Use this organic HAP Emissions Factor (EF) Equation for materials with 33 percent or more organic HAP (19 percent for nonatomized gel coat) ¹²³
1. Open molding operation	a. manual resin application	i. Nonvapor-suppressed resin	$EF = 0.126 \times \%HAP \times 2000$	$EF = ((0.286 \times \%HAP) - 0.0529) \times 2000$
		ii. Vapor-suppressed resin	$EF = 0.126 \times \%HAP \times 200 \times (1 - (0.5 \times VSE \text{ factor}))$	$EF = ((0.286 \times \%HAP) - 0.0529 \times 2000 \times (1 - (0.5 \times VSE \text{ factor})))$
		iii. Vacuum bagging/ closed-mold curing with roll out	$EF = 0.126 \times \%HAP \times 2000 \times 0.8$	$EF = ((0.286 \times \%HAP) - 0.0529) \times 2000 \times 0.8$
		iv. Vacuum bagging/ closed-mold curing without roll out	$EF = 0.126 \times \%HAP \times 2000 \times 0.5$	$EF = ((0.286 \times \%HAP) - 0.0529) \times 2000 \times 0.5$
	b. Atomized mechanical resin application	i. Nonvapor-suppressed resin	$EF = 0.169 \times \%HAP \times 2000$	$EF = ((0.714 \times \%HAP) - 0.18) \times 2000$
		ii. Vapor-suppressed resin	$EF = 0.169 \times \%HAP \times 2000 \times (1 - (0.45 \times VSE \text{ factor}))$	$EF = ((0.714 \times \%HAP) - 0.18) \times 2000 \times (1 - (0.45 \times VSE \text{ factor}))$
		iii. Vacuum Bagging/ closed-mold curing with roll-out	$EF = 0.169 \times \%HAP \times 2000 \times 0.85$	$EF = ((0.714 \times \%HAP) - 0.18) \times 2000 \times 0.85$
		iv. Vacuum Bagging/ closed-mold curing without roll-out	$EF = 0.169 \times \%HAP \times 2000 \times 0.55$	$EF = ((0.714 \times \%HAP) - 0.18) \times 2000 \times 0.55$
	c. Nonatomized mechanical resin application	i. Nonvapor-suppressed resin	$EF = 0.107 \times \%HAP \times 2000$	$EF = ((0.157 \times \%HAP) - 0.0165) \times 2000$
		ii. Vapor-suppressed resin	$EF = 0.107 \times \%HAP \times 2000 \times (1 - (0.45 \times VSE \text{ factor}))$	$EF = ((0.157 \times \%HAP) - 0.0165) \times 2000 \times [1 - (0.45 \times VSE \text{ factor})]$
		iii. Closed-mold curing with roll-out	$EF = 0.107 \times \%HAP \times 2000 \times 0.85$	$EF = ((0.157 \times \%HAP) - 0.0165) \times 2000 \times 0.85$

		iv. Vacuum bagging/ closed-mold curing without roll-out	$EF = 0.107 \times \%HAP \times 2000 \times 0.55$	$EF = ((0.157 \times \%HAP) - 0.0165) \times 2000 \times 0.55$
	d. Atomized mechanical resin application with robotic or automated spray control ⁵	Nonvapor- suppressed resin	$EF = 0.169 \times \%HAP \times 2000 \times 0.77$	$EF = 0.77 \times ((0.714 \times \%HAP) \times 0.18) \times 2000$
	e. Filament application ⁶	i. Nonvapor- suppressed resin	$EF = 0.184 \times \%HAP \times 2000$	$EF = ((0.2746 \times \%HAP) - 0.0298) \times 2000$
		ii. Vapor-suppressed resin	$EF = 0.12 \% \times HAP \times 2000$	$EF = ((0.2746 \times \%HAP) - 0.0298) \times 2000 \times 0.65$
	f. Atomized spray gel coat application	Nonvapor suppressed gel coat	$EF = 0.445 \times \%HAP \times 2000$	$EF = ((1.03646 \times \%HAP) - 0.195) \times 2000$
	g. Nonatomized spray gel coat application	Nonvapor- suppressed gel coat	$EF = 0.185 \times \%HAP \times 2000$	$EF = ((0.4506 \times \%HAP) - 0.0505) \times 2000$
	h. Atomized spray gel coat application using robotic or automated spray	Nonvapor- suppressed gel coat	$EF = 0.445 \times \%HAP \times 2000 \times 0.73$	$EF = ((1.03646 \times \%HAP) - 0.195) \times 2000 \times 0.73$
2. Centrifugal casting operations ⁷⁸	Heated air blown through molds	Nonvapor- suppressed resin	$EF = 0.558 \times \%HAP \times 2000$	$EF = 0.558 \times \%HAP \times 2000$
	Vented molds, but air vented through the molds is not heated	Nonvapor- suppressed resin	$EF = 0.026 \times \%HAP \times 2000$	$EF = 0.026 \times \%HAP \times 2000$

Footnotes to Table 1

¹ The equations in this table are intended for use in calculating emission factors to demonstrate compliance with the emission limits in subpart WWWW. These equations may not be the most appropriate method to calculate emission estimates for other purposes. However, this does not preclude a facility from using the equations in this table to calculate emission factors for purposes other than rule compliance if these equations are the most accurate available.

² To obtain the organic HAP emissions factor value for an operation with an add-on control device multiply the EF above by the add-on control factor calculated using Equation 1 of 40 CFR 63.5810. The organic HAP emissions factors have units of lbs of organic HAP per ton of resin or gel coat applied.

³ Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e. 33 percent HAP should be input as 0.33, not 33.

⁴ The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSE test method of appendix A to this subpart.

⁵ This equation is based on a organic HAP emissions factor equation developed for mechanical atomized controlled spray. It may only be used for automated or robotic spray systems with atomized spray. All spray operations using hand held spray guns must use the appropriate mechanical atomized or

mechanical nonatomized organic HAP emissions factor equation. Automated or robotic spray systems using nonatomized spray should use the appropriate nonatomized mechanical resin application equation.

⁶ Applies only to filament application using an open resin bath. If resin is applied manually or with a spray gun, use the appropriate manual or mechanical application organic HAP emissions factor equation.

⁷ These equations are for centrifugal casting operations where the mold is vented during spinning. Centrifugal casting operations where the mold is completely sealed after resin injection are considered to be closed molding operations.

⁸ If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, use the appropriate open molding equation with covered cure and no rollout to determine an emission factor for operations prior to the closing of the centrifugal casting mold. If the closed centrifugal casting mold is vented during spinning, use the appropriate centrifugal casting equation to calculate an emission factor for the portion of the process where spinning and cure occur. If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, and the mold is then closed and is not vented, treat the entire operation as open molding with covered cure and no rollout to determine emission factors.

Table 3 to Subpart WWWW of Part 63.--Organic HAP Emissions Limits for Existing Open Molding Sources, New Open Molding Sources Emitting Less Than 100 TPY of HAP, and New and Existing Centrifugal Casting and Continuous Lamination/Casting Sources that Emit Less Than 100 TPY of HAP

As specified in Sec. 63.5805, you must meet the following organic HAP emissions limits that apply to you:

If your operation type is . . .	And you use . .	Your organic HAP emissions limit is ¹ .
1. Open molding--corrosion-resistant and/or high strength (CR/HS)	a. Mechanical resin application	113 lb/ton
	b. Filament application	171 lb/ton
	c. Manual resin application	123 lb/ton
2. Open molding--non-CR/HS	a. Mechanical resin application	88 lb/ton
	b. Filament application	188 lb/ton
	c. Manual resin application	87 lb/ton
3. Open molding--tooling	a. Mechanical resin application	254 lb/ton
	b. Manual resin application	157 lb/ton
4. Open molding--low-flame spread/low-smoke products	a. Mechanical resin application	497 lbs/ton
	b. Filament application	270 lb/ton
	c. Manual resin application	238 lb/ton

5. Open molding--shrinkage controlled resins	a. Mechanical resin application	354 lb/ton
	b. Filament application	215 lb/ton
	c. Manual resin application	180 lb/ton
6. Open molding--gel coat ³	a. Tooling gel coating	440 lb/ton
	b. White/off white pigmented gel coating	267 lb/ton
	c. All other pigmented gel coating	377 lb/ton
	d. CR/HS or high performance gel coat	605 lb/ton
	e. Fire retardant gel coat	854 lb/ton
	f. Clean production gel coat	522 lb/ton
7. Centrifugal casting--CR/HS ^{4, 5}	a. Resin application with the mold closed, and the mold is vented during spinning and cure.	25 lb/ton
	b. Resin application with the mold closed, and the mold is not vented during spinning and cure.	NA This is considered to be a closed molding operation.
	c. Resin application with the mold open ,and the mold is vented during spinning and cure.	25 lb/ton
	d. Resin application with the mold open, and the mold is not vented during spinning and cure.	Use the appropriate open molding emission limit.
8. Centrifugal casting--non-CR/HS ^{4, 5}	a. Resin application with the mold closed, and the mold is vented during spinning and cure.	25 lb/ton
	b. Resin application with the mold closed, and the mold is not vented during spinning and cure.	NA. This is considered to be a closed molding operation.
	c. Resin application with the mold open, and the mold is vented during spinning and cure.	25 lb/ton

	d. Resin application with the mold open, and the mold is not vented during spinning and cure.	Use the appropriate open molding emission limit.
9. Pultrusion ⁶	NA	Reduce total organic HAP emissions by at least 60 weight percent.
10. Continuous lamination/casting	NA	Reduce total organic HAP emissions by at least 58.5 weight percent or not exceed a organic HAP emissions limit of 15.7 lbs or organic HAP per ton of neat resin plus and neat gel coat plus.

Footnotes to Table 3

¹ Organic HAP emissions limits for open molding and centrifugal casting are expressed as lb/ton. You must be at or below these values based on a 12-month rolling average.

² This emission limit applies regardless of whether the shrinkage controlled resin is used as a production resin or a tooling resin.

³ If you only apply gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If you use multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, you may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.

⁴ For compliance purposes, calculate your emission factor using only the appropriate centrifugal casting equation in item 2 of Table 1 to this subpart, or a site specific emission factor for after the mold is closed as discussed in § 63.5796.

⁵ Calculate your emission factor using the appropriate open molding covered cure emission factor in item 1 of Table 1 to this subpart, or a site specific emission factor as discussed in 63.5796.

⁶ Pultrusion machines that produce parts that meet the following criteria: 1,000 or more reinforcements or the glass equivalent of 1,000 ends of 113 yield roving or more; and have a cross sectional area of 60 square inches or more are not subject to this requirement. Their requirement is the work practice of air flow management which is described in Table 4 to this subpart.