OhioEPA

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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P.O. Box 1049
Columbus, OH 43216-1049

02/10/04

RE: Proposed Title V Chapter 3745-77 Permit
15-76-00-1621
U.S. Fiberglass Products, Inc.

Attn: Genevieve Damico AR-18J
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Damico:

The proposed issuance of the Title V permit for U.S. Fiberglass Products, Inc., has been created in Ohio EPA's State Air Resources System (STARS) on 02/10/04, for review by USEPA. This proposed action is identified in STARS as 3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact me at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: Canton Division of Air Pollution Control
File, DAPC PMU

State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 02/10/04	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 15-76-00-1621 to:
U.S. Fiberglass Products, Inc.
2660 Applegrove St. N.E.
Middlebranch, OH 44652

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

P004 (Gel Coat Station #1 (Gray)) Spraying of gel coat onto molds (Gray) in South building.	P006 (Spray Lay-up Station #2) Spraying of fiberglass and vapor suppressed resin onto molds (1 gun) in North building.	P008 (Spray Lay-up Station #4) Spraying of fiberglass and vapor suppressed resin onto molds (1 gun) in South building.
P005 (Spray Lay-up Station #1) Spraying of fiberglass and vapor suppressed resin onto molds (1 gun) in North building.	P007 (Spray Lay-up Station #3) Spraying of fiberglass and vapor suppressed resin onto molds (1 gun) in South building.	

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:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
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 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.

In accordance with OAC rule 3745-15-06, a malfunction 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 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 reports shall satisfy the requirements (in part) 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. OAC rule 3745-77-07(A)(3)(c) is not fully satisfied until the permittee addresses all other deviations of the federally enforceable requirements specified in the permit.

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 overrides 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 the requirements (in part) 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:**

Written reports that identify all other deviations of the federally enforceable requirements contained in this permit, including the 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 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.

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 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))

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.

(Authority for term: OAC rule 3745-77-07(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 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. 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

Each insignificant activity 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 by the responsible official of the date on which the emissions unit was permanently shut down. Authorization to operate the affected part or activity of the stationary source shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

If 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 monitoring, record keeping, reporting, or testing 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.

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 quarterly, i.e., 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 <u>Federally Enforceable</u> 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 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;

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; and

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

OhioEPA

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

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

02/10/04

RE: Proposed Title V Chapter 3745-77 Permit
15-76-00-1621
U.S. Fiberglass Products, Inc.

Attn: Genevieve Damico AR-18J
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Damico:

The proposed issuance of the Title V permit for U.S. Fiberglass Products, Inc., has been created in Ohio EPA's State Air Resources System (STARS) on 02/10/04, for review by USEPA. This proposed action is identified in STARS as 3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact me at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: Canton Division of Air Pollution Control
File, DAPC PMU

State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 02/10/04	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 15-76-00-1621 to:
U.S. Fiberglass Products, Inc.
2660 Applegrove St. N.E.
Middlebranch, OH 44652

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

P004 (Gel Coat Station #1 (Gray)) Spraying of gel coat onto molds (Gray) in South building.	P006 (Spray Lay-up Station #2) Spraying of fiberglass and vapor suppressed resin onto molds (1 gun) in North building.	P008 (Spray Lay-up Station #4) Spraying of fiberglass and vapor suppressed resin onto molds (1 gun) in South building.
P005 (Spray Lay-up Station #1) Spraying of fiberglass and vapor suppressed resin onto molds (1 gun) in North building.	P007 (Spray Lay-up Station #3) Spraying of fiberglass and vapor suppressed resin onto molds (1 gun) in South building.	

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:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
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 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.

In accordance with OAC rule 3745-15-06, a malfunction 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 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 reports shall satisfy the requirements (in part) 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. OAC rule 3745-77-07(A)(3)(c) is not fully satisfied until the permittee addresses all other deviations of the federally enforceable requirements specified in the permit.

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 overrides 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 the requirements (in part) 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:**

Written reports that identify all other deviations of the federally enforceable requirements contained in this permit, including the 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 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.

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 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))

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.

(Authority for term: OAC rule 3745-77-07(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 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. 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

Each insignificant activity 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 by the responsible official of the date on which the emissions unit was permanently shut down. Authorization to operate the affected part or activity of the stationary source shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

If 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 monitoring, record keeping, reporting, or testing 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.

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 quarterly, i.e., 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 <u>Federally Enforceable</u> 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 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;

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; and

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 Enforcable Section

1. This facility is subject to OAC rule 3745-15-06, "Malfunction of equipment; scheduled maintenance; reporting"; as described in General Term and Condition I.A.2.

2. This facility is subject to OAC rule 3745-15-07, "Air pollution Nuisances Prohibited"; as described in General Term and Condition I.A.20.

3. This Term and Condition and it's subsections and the Terms and Conditions noted below concern the federal rule 40 CFR Part 63, Subpart WWWW - National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

3.a The text of Subpart WWWW, with some exceptions as noted in the next paragraph, follows below in sections II.A.4 through II.A.29 and Attachment #1 of this permit. Attachment #1 includes Tables 1 through 15 and Appendix A of Subpart WWWW. Note that the standard STARS numbering format is not utilized in sections II.A.4 through II.A.29 and Attachment #1, but the numbering format from each of the subpart's subsections is utilized in order to more easily make references to the subpart in this permit.

The text of the following subsections of Subpart WWWW are not included in this permit because the permittee does not manufacture fiberglass boats or boat parts or perform continuous lamination/casting or pultrusion operations: 63.5820, 63.5830, 63.5865, 63.5870, 63.5875, 63.5880, 63.5885, and 63.5890.

The Specific Facility Terms and Conditions in II.A.3 and subsections shall supersede the Specific Facility Terms and Conditions in II.A.4 through II.A.29, in the case of conflicting requirements between these two sets of Specific Facility Terms and Conditions.

3.b U.S. Fiberglass, Inc. is a reinforced plastic composites production facility that is a major source of Hazardous Air Pollutants (HAPs) and is subject to (an affected source under) 40 CFR Part 63, Subpart WWWW [from 63.5785].

U. S Fiberglass, Inc. is an affected source that commenced construction prior to August 2, 2001 and is therefore an existing affected source [from 63.5795].

A. State and Federally Enforcable Section (continued)

3.c The permittee's affected source consists of all parts of the facility engaged in the following operations: open molding, closed molding, centrifugal casting, continuous lamination, continuous casting, polymer casting, pultrusion, sheet molding compound (SMC) manufacturing, bulk molding compound (BMC) mfg,, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts manufactured at U.S. Fiberglass, Inc. Note that there are no exemptions for any smaller operations [from 63.5790(b)].

The following operations are specifically excluded from any requirements in this subpart: application of mold sealing and release agents, mold stripping and cleaning, repair of parts that the permittee did not manufacture, including non-routine manufacturing of parts, personal activities that are not part of the manufacturing operations (such as hobby shops on military bases), prepreg materials as defined in 63.5935, non-gel coat surface coatings, 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 CAA [from 63.5790(c)].

Subpart WWWW can be administered by the EPA, or a delegated authority such as the permittee's State, local, or tribal agency. If the EPA Administrator has delegated authority to the permittee's State, local, or tribal agency, then that agency has the authority to administer and enforce this subpart. The permittee should contact the EPA Region V Office to find out if this subpart is delegated to the permittee's State, local, or tribal agency [from 63.5930(a)].

The implementation and enforcement authorities that will not be delegated to the permittee's State, local, or tribal agency are listed in paragraphs 63.5930(c)(1) through (c)(4) [from 63.5930(b) and (c)].

The definition of the terms used in the subpart are defined in section 63.5935 and in 40 CFR 63.2. [from 63.5935].

3.d The permittee shall comply with the standards in the subpart by the dates specified in Table 2 to this subpart. Facilities meeting an organic HAP emissions standard based on a rolling, 12-month average must begin collecting data on the compliance date in order to demonstrate compliance [from 63.5800].

The permittee shall comply with Subpart WWWW by three years from the publication of the rule in the Federal Register or April 21, 2006, but not before this date, unless specifically indicated in this permit or in the subpart [from Table 2, item 1].

After the effective date of the subpart, the permittee shall be in compliance with the annual average organic HAP emissions limits for open molding operations in Table 3 of the subpart at all times except as in the next paragraph [from 63.5835(a)].

If the permittee elects to meet the organic HAP emissions limit on a rolling, 12-month average, then U.S. Fiberglass, Inc. shall initiate collection of the required data on the compliance date and shall demonstrate compliance one year after the compliance date, that is April 21, 2007 [from 63.5840].

After the effective date of the subpart (April 21, 2006), the permittee shall be in compliance with the work practice standards in Table 4 of the subpart at all times [from 63.5835(a)].

A. State and Federally Enforcable Section (continued)

3.e The permittee shall be subject to Subpart WWWW of 40 CFR Part 63.

The permittee shall be subject to the portions of the sections 63.1 to 63.15, the General Provisions of 40 CFR Part 63, as is indicated in Table 15 of Subpart WWWW of 40 CFR Part 63 [from 63.5925].

The permittee shall meet the organic HAP emissions limits for open molding operations in Table 3 of the subpart [from 63.5805(a)].

After the effective date of the subpart (April 21, 2006), the permittee shall be in compliance with the organic HAP emissions limits in Table 3 and the organic HAP content limits in Table 7 at all times [from 63.5835(a)].

The permittee shall meet the applicable work practice standards in Table 4 of this subpart [63.5805(a)].

In order to demonstrate continuous compliance with the applicable standards in section 63.5805 that require compliance with the work practice standards in Table 4 to the subpart, the permittee shall perform the work practice required for the operation [from 63.5900(a)(4)].

In order to demonstrate continuous compliance with the applicable organic HAP emissions limits and work practice standards in the subpart, the permittee shall meet the applicable organic HAP emissions limits and work practice standards during periods of startup, shutdown, or malfunction [from 63.5900(c)].

After the effective date of the subpart (April 21, 2006), the permittee shall always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in 40 CFR, Subpart A, 63.6(e)(1)(i), the text of which follows [from 68.5835(c)].

At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards [from 63.6(e)(1)(i)].

In order to demonstrate continuous compliance with the applicable standards in section 63.5805(a) that involve organic HAP emissions limits, the permittee shall (1) maintain an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Tables 3 of this subpart, on a rolling, 12-month average, or (2) by including in each compliance report a statement that all resins and gel coats meet the appropriate organic HAP emissions limits, as discussed in section 63.5895(d) [from 63.5900(a)(2)].

In order to demonstrate continuous compliance with the applicable standards in section 63.5805 that involve organic HAP content limits, the permittee shall (1) maintain an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 7 to this subpart, on a rolling, 12-month average, or (2) include in each compliance report a statement that all resins and gel coats individually meet the appropriate organic HAP content limits, as discussed in section 63.5895(d) [from 63.5900(a)(3)].

A. State and Federally Enforcable Section (continued)

3.f The permittee shall use one of the methods ((a) through (d)) in 63.5810 of Subpart WWWW to comply with the annual average organic HAP emissions limits for open molding operations in Table 3 of the subpart. These methods are: (a) meet the individual organic HAP emissions limits for each operation; (b) use the HAP emissions factor averaging option; (c) If the permittee has multiple operation types, meet the organic HAP emissions limit for one operation type, and use the same resins for all operations of that resin type; and, (d) use resins and gel coats that do not exceed the maximum organic HAP contents shown in Table 3 of the subpart. [from 63.5810].

In order to demonstrate initial compliance with the annual average organic HAP emissions limits for open molding operations in Table 3 of the subpart or to demonstrate initial compliance with an organic HAP content limit in Table 7 to the subpart, the permittee shall utilize one of the three options in item 1 of Table 8 of the subpart [from 63.5860(a) and Table 8].

The permittee shall not use cleaning solvents that contain any HAPs, 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 [from Table 4].

The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety [from Table 4].

In order to demonstrate initial compliance with the requirements in section 63.5805(g) of this subpart, for repair operations subject to the subpart as defined in section 63.5785, the permittee shall utilize the procedures shown in Tables 3 and 4 of the subpart [63.5860(a)].

3.g The permittee shall keep the records listed in section 63.5915(a)(1) through (3) [from 63.5915(a)].

The permittee shall keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3, 5, and 7 to the subpart [from 63.5915(c)].

The permittee shall maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to section 63.5920(b) through (d) and section 63.10(b)(1), which follows [from 63.5920(a) through (d)].

General record keeping requirements.
The owner or operator of an affected source subject to the provisions of this part shall maintain files of all information (including all reports and notifications) required by this part recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche [from 63.10(b)(1)].

To demonstrate continuous compliance to meet any organic HAP emissions limits in Table 3 of the subpart, the permittee shall collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used [from 63.5895(c)].

A. State and Federally Enforcable Section (continued)

To demonstrate continuous compliance to meet any organic HAP content limits in Table 7 of the subpart while averaging organic HAP content, the permittee shall collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used [from 63.5895(c)].

Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier [from 63.5895(c)].

If the permittee initially demonstrates that all resins and gel coats individually meet the applicable organic HAP emissions limits, or organic HAP content limits, then 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 shown in Table 3 or 7 to the subpart. If after this initial demonstration, the permittee changes to a higher organic HAP content, or changes to a higher-emitting resin or gel coat application method, then the permittee must either again demonstrate that all resins and gel coats still meet the applicable organic HAP emissions limits, or begin collecting resin and gel coat use records and calculate compliance on a rolling, 12-month average [from 63.5895(d)].

The permittee shall keep a certified statement that the permittee is in compliance with the work practice requirements in Table 4 to the subpart, as applicable [from 63.5915(d)].

3.h The permittee shall determine the applicable notifications from the list of notifications in Table 13 of the subpart. The permittee shall submit the applicable notifications by the following dates (from Table 13). The notifications are described more fully in 40 CFR Part 63, Subpart A, referenced in Table 13 to this subpart [from 63 5905(a)].

If the permittee changes any information submitted in any notification required by the above paragraph, the permittee must submit the changes in writing to the Administrator within 15 calendar days after the change [from 63 5905(b)].

If the permittee's source is an existing source subject to this subpart, an Initial Notification containing the information specified in section 63.9(b)(2) shall be submitted no later than 120 days after April 4, 2003 or August 2, 2003 [from Table 13].

If the permittee's source is a new source subject to this subpart, the notifications specified in 40 CFR 63.9(b)(4) and (5) shall be submitted no later than the dates specified in 40 CFR 63.9(b)(4) and (5) [from Table 13].

If the permittee elects to meet the organic HAP emissions limit on a rolling, 12-month average, then U.S. Fiberglass, Inc. shall initiate collection of the required data on the compliance date and shall demonstrate compliance one year after the compliance date, that is April 21, 2007, and, shall submit a Notification of Compliance Status as specified in 40 CFR 63.9(h) by no later than 1 year and 30 days after the permittee's compliance date, or May 21, 2007 [from 63.5840 and Table 13, item 4].

If the permittee's source is complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging a Notification of Compliance Status as specified in section 63.9(h) shall be submitted no later than 30 calendar days after the permittee's facility compliance date, or May 21, 2006 [from Table 13, item 5].

The permittee shall submit a certified statement in the notice of compliance status required by Table 13 and 40 CFR 63.9(b)(2) 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 [from Table 9].

The permittee shall submit a certified statement in the notice of compliance status required by Table 13 and 40 CFR 63.9(b)(2) that all cleaning materials except styrene contained in closed systems or materials used to clean cured resin from application equipment, contain no HAP [from Table 9].

A. State and Federally Enforcable Section (continued)

The permittee shall submit each applicable report in Table 14 to the subpart.

The permittee shall submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in Table 14 to this subpart, and not based on the requirements in 40 CFR 63.999 [from 63.1905(h)].

The permittee shall submit the compliance report required by Table 14, item 1 of the subpart semiannually according to the requirements in 40 CFR 63.5910(b), and, the compliance report shall contain the information in 40 CFR 63.5910(c)(1) through (c)(5) and from the following five paragraphs. [from Table 14 and 63.5910(c)].

For each deviation from a organic HAP emissions limitation (i.e., emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at the affected source which is not using a compliance monitoring system (CMS) to comply with the organic HAP emissions limitations or work practice standards in this subpart, the compliance report must contain the information in paragraphs 63.5910(c)(1) through (4) and 63.5910(d)(1) and (2) of the subpart. This includes periods of startup, shutdown, and malfunction [from 63.5910(d)].

The compliance report shall include information for the following three subjects [from Table 14].

First, a statement that there were no deviations during that reporting period if there were no deviations from any emission limitations (emission limit, operating limit, opacity limit, and visible emission limit) that apply the permittee and there were no deviations from the applicable requirements for work practice standards in Table 4 to this subpart. If there were no periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control as specified in 40 CFR 63.8(c)(7), the report must also contain a statement that there were no periods during which the CMS was out of control during the reporting period.

Second, the information in 40 CFR 63.5910(d) if the permittee has a deviation from any emission limitation (emission limit, operating limit, or work practice standard) during the reporting period. If there were periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control, as specified in 40 CFR 63.8(c)(7), the report must contain the information in 40 CFR 63.5910(e).

Third, the information in section 63.10(d)(5)(i) if the permittee had a startup, shutdown or malfunction during the reporting period, and the permittee took actions consistent with the permittee's startup, shutdown, and malfunction plan.

Unless the Administrator has approved a different schedule for submission of reports under 40 CFR 63.10(a), the permittee shall submit each report by the date specified in 40 CFR 63.5910(b)(1) through (b)(5) of the section [from 63.5910(b)]. The first compliance report shall cover the period beginning on April 21, 2006 and ending on June 30, 2006. The first compliance report shall be postmarked or delivered by July 31, 2006. The subsequent compliance reports must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 to December 31 and shall be postmarked or delivered by the last day of the month following the semiannual reporting period [from 63.5910(b)].

If the permitte's source qualifies for a compliance extension as specified in 40 CFR 63.9(c), a request for a compliance extension as specified in 40 CFR63.9(c) shall be submitted no later than the dates specified in 40 CFR 63.6(i) [from Table 13].

In order to demonstrate continuous compliance with the applicable standards in 40 CFR 63.5805, the permittee shall report each deviation from each applicable standard according to the requirements in 40 CFR 63.5910 [from 63.5900(b)].

A. State and Federally Enforcable Section (continued)

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 the subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 71.6(a)(3)(iii)(A) and required by Ohio Administrative Code (OAC) rule 3745-77-07(A)(3)(C)(i) and (ii). If an affected source submits a compliance report pursuant to Table 14 to the subpart along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 71.6(a)(3)(iii)(A) and (OAC) rule 3745-77-07(A)(3)(C)(i) and (ii), 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 this subpart, 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 [from 63.5910(g)].

3.i The permittee shall determine the organic HAP content of the resins and gel coats that are utilized in the facility in accordance with 40 CFR 63.5797 of the subpart [from 63.5797].

4. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5780 What is the Purpose of this subpart?

This subpart establishes national emissions standards for hazardous air pollutants (NESHAP) for reinforced plastic composites production. This subpart also establishes requirements to demonstrate initial and continuous compliance with the hazardous air pollutants (HAP) emissions standards.

5. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5785 Am I subject to this subpart?

(a) You are subject to this subpart if you own or operate a reinforced plastic composites production facility that is located at a major source of HAP emissions. Reinforced plastic composites production is limited to operations in which reinforced and/or nonreinforced plastic composites or plastic molding compounds are manufactured using thermoset resins and/or gel coats that contain styrene to produce plastic composites. The resins and gel coats may also contain materials designed to enhance the chemical, physical, and/or thermal properties of the product. Reinforced plastic composites production also includes cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites.

(b) You are not subject to this subpart if your facility only repairs reinforced plastic composites. Repair includes the non-routine manufacture of individual components or parts intended to repair a larger item as defined in Section 63.5935.

(c) You are not subject to this subpart if your facility is a research and development facility as defined in section 112(c)(7) of the Clean Air Act (CAA).

(d) You are not subject to this subpart if your reinforced plastic composites operations use less than 1.2 tons per year (tpy) of thermoset resins and gel coats that contain styrene combined.

6. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5790 What parts of my plant does this subpart cover?

A. State and Federally Enforcable Section (continued)

(a) This subpart applies to each new or existing affected source at reinforced plastic composites production facilities.

(b) The affected source consists of all parts of your facility engaged in the following operations: open molding, closed molding, centrifugal casting, continuous lamination, continuous casting, polymer casting, pultrusion, sheet molding compound (SMC) manufacturing, bulk molding compound (BMC) manufacturing, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts you also manufacture.

(c) The following operations are specifically excluded from any requirements in this subpart: application of mold sealing and release agents, mold stripping and cleaning, repair of parts that you did not manufacture, including non-routine manufacturing of parts, personal activities that are not part of the manufacturing operations (such as hobby shops on military bases), prepreg materials as defined in section 63.5935, non-gel coat surface coatings, 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 CAA.

(d) Production resins that must meet military specifications are allowed to meet the organic HAP limit contained in that specification. In order for this exemption to be used, you must supply to the permitting authority the specifications certified as accurate by the military procurement officer, and those specifications must state a requirement for a specific resin, or a specific resin HAP content. Production resins for which this exemption is used must be applied with nonatomizing resin application equipment unless you can demonstrate this is infeasible. You must keep a record of the resins for which you are using this exemption.

7. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5795 How do I know if my reinforced plastic composites production facility is a new affected source or an existing affected source?

(a) A reinforced plastic composites production facility is a new affected source if it meets all the criteria in paragraphs (a)(1) and (2) of this section.

(1) You commence construction of the affected source after August 2, 2001.

(2) You commence construction, and no other reinforced plastic composites production affected source exists at that site.

(b) For the purposes of this subpart, an existing affected source is any affected source that is not a new affected source.

8. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5796 What are the organic HAP emissions factor equations in Table 1 to this subpart and how are they used in this subpart?

Emissions factors are used in this subpart to determine compliance with certain organic HAP emissions limits in Tables 3 and 5 to this subpart. You may use the equations in Table 1 to this subpart to calculate your emissions factors. Equations are available for each open molding operation and centrifugal casting operation and have units of pounds of organic HAP emitted per ton (lb/ton) of resin or gel coat applied. These equations are intended to provide a method for you to demonstrate compliance without the need to conduct for a HAP emissions test. In lieu of these equations, you can elect to use site-specific organic HAP emissions factors to demonstrate compliance provided your site-specific organic HAP emissions factors are incorporated in the facility's air emissions permit and are based on actual facility HAP emissions test data. You may also use the organic HAP emissions factors calculated using the equations in Table 1 to this subpart, combined with resin and gel coat use data, to calculate your organic HAP emissions.

A. State and Federally Enforcable Section (continued)

9. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5797 How do I determine the organic HAP content of my resins and gel coats?

In order to determine the organic HAP content of resins and gel coats, you may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in paragraphs (a) through (c) of this section, as applicable.

(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, you must 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 you must use the measured organic HAP content to determine compliance.

(c) If the organic HAP content is provided as a single value, you may 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 you still may 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 you must use the measured organic HAP content to determine compliance.

10. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5798 What if I want to use, or I manufacture, an application technology (new or existing) whose organic HAP emissions characteristics are not represented by the equations in Table 1 to this subpart?

If you wish to use a resin or gel coat application technology (new or existing), whose emission characteristics are not represented by the equations in Table 1 to this subpart, you may use the procedures in paragraphs (a) or (b) of this section to establish an organic HAP emissions factor. This organic HAP emissions factor may then be used to determine compliance with the emission limits in this subpart, and to calculate facility organic HAP emissions.

(a) Perform a organic HAP emissions test to determine a site-specific organic HAP emissions factor using the test procedures in Section 63.5850.

(b) Submit a petition to the Administrator for administrative review of this subpart. This petition must contain a description of the resin or gel coat application technology and supporting organic HAP emissions test data obtained using EPA test methods or their equivalent. The emission test data should be obtained using a range of resin or gel coat HAP contents to demonstrate the effectiveness of the technology under the different conditions, and to demonstrate that the technology will be effective at different sites. We will review the submitted data, and, if appropriate, update the equations in Table 1 to this subpart.

11. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5799 How do I calculate my facility's organic HAP emissions on a tpy basis for purposes of determining which paragraphs of 63.5805 apply?

A. State and Federally Enforcable Section (continued)

To calculate your facility's organic HAP emissions in tpy for purposes of determining which paragraphs in Section 63.5805 apply to you, you must use the procedures in either paragraph (a) of this section for new facilities prior to startup, or paragraph (b) of this section for existing facilities and new facilities after startup. You are not required to calculate or report emissions under this section if you are an existing facility that does not have centrifugal casting or continuous lamination/casting operations, or a new facility that does not have any of the following operations: open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC and BMC manufacturing, and mixing. Emissions calculation and emission reporting procedures in other sections of this subpart still apply. Calculate organic HAP emissions prior to any add-on control device, and do not include organic HAP emissions from any resin or gel coat used in operations subject to the Boat Manufacturing NESHAP, 40 CFR part 63, subpart VVVV, or from the manufacture of large parts as defined in Section 63.5805(d)(2). For centrifugal casting operations at existing facilities, do not include any organic HAP emissions where resin or gel coat is applied to an open centrifugal mold using open molding application techniques. Table 1 and the Table 1 footnotes to this subpart present more information on calculating centrifugal casting organic HAP emissions. The timing and reporting of these calculations is discussed in paragraph (c) of this section.

(a) For new facilities prior to startup, calculate a weighted average organic HAP emissions factor for the operations specified in Section 63.5805 (b) and (d) on a lbs/ton of resin and gel coat basis. Base the weighted average on your projected operation for the 12 months subsequent to facility startup. Multiply the weighted average organic HAP emissions factor by projected resin use over the same period. You may calculate your organic HAP emissions factor based on the factors in Table 1 to this subpart, or you may use any HAP emissions factor approved by us, such as factors from the Compilation of Air Pollutant Emissions Factors, Volume I: Stationary Point and Area Sources (AP-42), or organic HAP emissions test data from similar facilities.

(b) For existing facilities and new facilities after startup, you may use the procedures in either paragraph (b)(1) or (2) of this section. If the emission factors for an existing facility have changed over the period of time prior to their initial compliance date due to incorporation of pollution-prevention control techniques, existing facilities may base the average emission factor on their operations as they exist on the compliance date. If an existing facility has accepted an enforceable permit limit of less than 100 tons per year of HAP, and can demonstrate that they will operate at that level subsequent to the compliance date, the they can be deemed to be below the 100 tpy threshold.

(1) Use a calculated emission factor. Calculate a weighted average organic HAP emissions factor on a lbs/ton of resin and gel coat basis. Base the weighted average on the prior 12 months of operation. Multiply the weighted average organic HAP emissions factor by resin and gel coat use over the same period. You may calculate this organic HAP emissions factor based on the equations in Table 1 to this subpart, or you may use any organic HAP emissions factor approved by us, such as factors from AP-42, or site-specific organic HAP emissions factors if they are supported by HAP emissions test data.

(2) Conduct performance testing. Conduct performance testing using the test procedures in Section 63.5850 to determine a site-specific organic HAP emissions factor in units of lbs/ton of resin and gel coat used. Conduct the test under conditions expected to result in the highest possible organic HAP emissions. Multiply this factor by annual resin and gel coat use to determine annual organic HAP emissions. This calculation must be repeated and reported annually.

(c) Existing facilities must initially perform this calculation based on their 12 months of operation prior to the effective date of this subpart, and include this information with their initial notification report. Existing facilities must repeat the calculation based on their resin and gel coat use in the 12 months prior to their initial compliance date, and submit this information with their initial compliance report. After their initial compliance date, existing and new facilities must recalculate organic HAP emissions over the 12-month period ending June 30 or December 31, whichever date is the first date following their compliance date specified in Section 63.5800. Subsequent calculations should cover the periods in the semiannual compliance reports.

12. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5800 When do I have to comply with this subpart?

A. State and Federally Enforcable Section (continued)

You must comply with the standards in this subpart by the dates specified in Table 2 to this subpart. Facilities meeting a organic HAP emissions standard based on a 12-month rolling average must begin collecting data on the compliance date in order to demonstrate compliance.

13. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5805 What standards must I meet to comply with this subpart?

You must meet the requirements of paragraphs (a) through (h) of this section that apply to you. You may elect to comply using any options to meeting these standards described in Sections 63.5810 through 63.5830. Use the procedures in Section 63.5799 to determine if you meet or exceed the 100 tpy threshold.

(a) If you have an existing facility that does not have any centrifugal casting or continuous lamination/casting operations, or an existing facility that does have centrifugal casting or continuous lamination/casting operations, but the combination of all centrifugal casting and continuous lamination/casting operations emit less than 100 tpy of HAP, you must meet the annual average organic HAP emissions limits in Table 3 to this subpart and the work practice standards in Table 4 to this subpart that apply to you.

(b) If you have an existing facility that emits 100 tpy or more of HAP from the combination of all centrifugal casting and continuous lamination/casting operations, you must reduce the total organic HAP emissions from these operations by at least 95 percent by weight and meet any applicable work practice standards in Table 4 to this subpart that apply to you. Operations other than centrifugal casting, and continuous lamination/casting, must meet the requirements in Tables 3 and 4 to this subpart. As an alternative to meeting 95 percent by weight, you may meet the organic HAP emissions limits in Table 5 to this subpart. If you have a continuous lamination/casting operation, that operation may alternatively meet a organic HAP emissions limit of 1.47 lbs/ton of neat resin plus and neat gel coat plus applied. For centrifugal casting, the percent reduction requirement does not apply to organic HAP emissions that occur during resin application onto an open centrifugal casting mold using open molding application techniques.

(c) If you have a new facility that emits less than 100 tpy of HAP from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, you must meet the annual average organic HAP emissions limits in Table 3 to this subpart and the work practice standards in Table 4 to this subpart that apply to you.

(d)(1) Except as provided in paragraph (d)(2) of this section, if you have a new facility that emits 100 tpy or more of HAP from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, you must reduce the total organic HAP emissions from these operations by at least 95 percent by weight and meet any applicable work practice standards in Table 4 to this subpart that apply to you. As an alternative to meeting 95 percent by weight, you may meet the organic HAP emissions limits in Table 5 to this subpart. If you have a continuous lamination/casting operation, that operation may alternatively meet a organic HAP emissions limit of 1.47 lbs/ton of neat resin plus and neat gel coat plus applied.

(d)(2)(i) If your new facility manufactures large reinforced plastic composites parts using open molding or pultrusion operations, the specific open molding and pultrusion operations used to produce large parts are not required to reduce HAP emissions by 95 weight percent, but must meet the emission limits in Table 3 to this subpart.

A. State and Federally Enforcable Section (continued)

(d)(2)(ii) A large open molding part is defined as a part that, when the final finished part is enclosed in the smallest rectangular six-sided box into which the part can fit, the total interior volume of the box exceeds 250 cubic feet, or any interior sides of the box exceed 50 square feet.

(d)(2)(iii) A large pultruded part is a part that exceeds an outside perimeter of 24 inches or has more than 350 reinforcements.

(e) If you have a new or existing facility subject to paragraphs (a) or (c) of this section at their initial compliance date, that subsequently meets or exceeds the 100 tpy threshold in any calendar year, you must notify your permitting authority in your compliance report. You may at the same time request a one-time exemption from the requirements of paragraphs (b) or (d) of this section in your compliance report if you can demonstrate all of the following:

(1) The exceedance of the threshold was due to circumstances that will not to be repeated.

(2) The average annual organic HAP emissions from the potentially affected operations for the last 3 years were below 100 tpy.

(3) Projected organic HAP emissions for the next calendar year are below 100 tpy, based on projected resin and gel coat use and the HAP emission factors calculated according to the procedures in Section 63.5799.

(f) If you apply for an exemption in paragraph (e) of this section, and subsequently exceed the HAP emission thresholds specified in paragraphs (a) or (c) of this section over the next 12-month period, you must notify the permitting authority in your semi-annual report, the exemption is removed, and your facility must comply with paragraphs (b) or (d) of this section within 3 years from the time your organic HAP emissions first exceeded the threshold.

(g) If you have repair operations subject to this subpart as defined in Section 63.5785, these repair operations must meet the requirements in Tables 3 and 4 to this subpart, and are not required to meet the 95 percent organic HAP emissions reduction requirements in paragraphs (b) or (d) of this section.

(h) If you use an add-on control device to comply with this subpart, you must meet all requirements contained in 40 CFR part 63, subpart SS.

14. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5810 What are my options for meeting the standards for open molding and centrifugal casting operations at new and existing sources?

You must use one of the following methods in paragraphs (a) through (d) of this section to meet the standards in Section 63.5805. When you are complying with an emission limit in Tables 3 or 5 to this subpart, you may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, covered curing techniques, and routing part or all of your emissions to an add-on control. The necessary calculations must be completed within 30 days after the end of each month. You may switch between the compliance options in paragraphs (a) through (d) of this section. When you change to an option based on a 12-month rolling average, you must base the average on the previous 12 months of data calculated using the compliance option you are currently using unless you were using the compliant materials option in paragraph (d) of this section. In this case, you must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

A. State and Federally Enforcable Section (continued)

(a) Meet the individual organic HAP emissions limits for each operation. Demonstrate that you meet the individual organic HAP emissions limits for each open molding operation and for each centrifugal casting operation type in Tables 3, or 5 to this subpart that apply to you. This is done in two steps. First, determine an organic HAP factor for each individual resin and gel coat, application method, and control method you use in a particular operation. Second, calculate, for each particular operation type, a weighted average of those organic HAP emissions factors based on resin and gel coat use. Your calculated organic HAP emissions factor must either be at or below the applicable organic HAP emissions limit in Tables 3 or 5 to this subpart based on a 12-month rolling average. Use the procedures described in paragraphs (a)(1) through (3) of this section to calculate average organic HAP emissions factors for each of your operations.

(1) Calculate your actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following three characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the application technique, or the control technique. You must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to this subpart for open molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in Section 63.5796.

If you want to use vapor suppressants to meet the organic HAP emissions limit for open molding, you must determine the vapor suppressant effectiveness by conducting testing according to the procedures specified of appendix A to subpart WWWW of 40 CFR part 63. If you want to use an add-on control device to meet the organic HAP emissions limit, you must determine the add-on control factor by conducting capture and control efficiency testing, using the procedures specified in 63.5850 to this subpart. The organic HAP emissions factor calculated from the equations in Table 1 to this subpart, or site-specific emissions factors, is multiplied by the add-on control factor to calculate the organic HAP emissions factor after control. Use Equation 1 of this section to calculate the add-on control factor used in the organic HAP emissions factor equations.

Add on Control Factor = 1 - % Control Efficiency/100 (Eq. 1)

Where:
Percent Control Efficiency = a value calculated from organic HAP emissions test measurements made according to the requirements of Section 63.5850 to this subpart

(2) Calculate your actual operation organic HAP emissions factor for the last 12 months for each open molding operation type and for each centrifugal casting operation type by calculating the weighted average of the individual process stream organic HAP emissions factors within each respective operation. To do this, sum the product of each individual organic HAP emissions factor calculated in paragraph (a)(1) of this section and the amount of neat resin plus and neat gel coat plus usage that correspond to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type. Use Equation 2 of this section to calculate your actual organic HAP emissions factor for each open molding operation type and each centrifugal casting operation type.

Equation 2:
The Actual Operation Organic HAP Emissions Factor is equal to the summation from i equals 1 to n of the [Actual Process Stream EF sub i times the Material sub i] divided by the summation from i equals 1 to n of the Material sub i.

A. State and Federally Enforcable Section (continued)

Where:
Actual Process Stream EF sub i = actual organic HAP emissions factor for process stream i, lbs/ton

Material sub i = neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream i, tons

n = number of process streams where you calculated an organic HAP emissions factor

(3) Compare each organic HAP emissions factor calculated in paragraph (b)(2) of this section with its corresponding organic HAP emissions limit in Tables 3 or 5 to this subpart. If all emissions factors are equal to or less than their corresponding emission limits, then you are in compliance.

(b) HAP Emissions factor averaging option. Demonstrate each month that you meet each weighted average of the organic HAP emissions limits in Tables 3 or 5 to this subpart that apply to you. When using this option, you must demonstrate compliance with the weighted average organic HAP emissions limit for all your open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emissions limit for all your centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other.

(1) Each month calculate the weighted average organic HAP emissions limit for all open molding operations and the weighted average organic HAP emissions limit for all centrifugal casting operations for your facility for the last 12-month period to determine the organic HAP emissions limit you must meet. To do this, multiply the individual organic HAP emissions limits in Tables 3 or 5 to this subpart for each open molding (centrifugal casting) operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding (centrifugal casting)operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) over the last 12 months. Use Equation 3 of this section to calculate the weighted average organic HAP emissions limit for all open molding operations and separately for all centrifugal casting operations.

Equation 3:
The Weighted Average Emissions Limit is equal to the summation from i equals 1 to n of [EL sub i times Material sub i] divided by the summation from i equals 1 to n of Material sub i.

Where:
EL sub i = organic HAP emissions limit for operation type i, lbs/ton from Tables 3, 5 or 7 to this subpart

Material sub i = neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons

n = number of operations

(2) Each month calculate your actual weighted average organic HAP emissions factor for open molding and centrifugal casting. To do this, multiply your actual open molding (centrifugal casting) operation organic HAP emissions factors and the amount of neat resin plus and neat gel coat plus used in each open molding (centrifugal casting) operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) operations. You must calculate your actual individual HAP emissions factors for each operation type as described in paragraphs (a)(1) and (2) of this section. Use Equation 4 of this section to calculate your actual weighted average organic HAP emissions factor.

Equation 4:
The Actual Weighted Average Organic HAP Emissions Factor is equal to the summation from i equals 1 to n of [the Actual Operation EF sub i times the Material sub i] divided by the summation from i equals 1 to n of the Material sub i.

A. State and Federally Enforcable Section (continued)

Where:
Actual Individual EFsub i = Actual organic HAP emissions factor for operation type i, lbs/ton

Material sub i = neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons

n = number of operations

(3) Compare the values calculated in paragraphs (b)(1) and (2) of this section. If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then you are in compliance.

(c) If you have multiple operation types, meet the organic HAP emissions limit for one operation type, and use the same resin(s) for all operations of that resin type. If you have more than one operation type, you may meet the emission limit for one of those operations, and use the same resin(s) in all other open molding and centrifugal casting operations.

(1) This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling.

(2) For any combination of manual resin application, mechanical resin application, filament application, or centrifugal casting, you may elect to meet the organic HAP emissions limit for any one of these operations and use that operation's same resin in all of the resin operations listed in this paragraph. Table 7 to this subpart presents the possible combinations based on a facility selecting the application process that results in the highest allowable organic HAP content resin. If your resin organic HAP content is below the applicable values shown in Table 7 to this subpart, you are in compliance.

(3) You may also use a weighted average organic HAP content for each operation described in paragraph (c)(2) of this section. Calculate the weighted average organic HAP content monthly. Use Equation 2 in Section 63.5810(a)(2) except substitute organic HAP content for organic HAP emissions factor. You are in compliance if the weighted average organic HAP content based on the last 12 months of resin use is less than or equal to the applicable organic HAP contents in Table 7 to this subpart.

(4) You may simultaneously use the averaging provisions in paragraph (b) of this section to demonstrate compliance for any operations and/or resins you do not include in your compliance demonstrations is paragraphs (c)(2) and (3) of this section. However, any resins for which you claim compliance under the option in paragraphs (c)(2) and (3) of this section may not be included in any of the averaging calculations described in paragraphs (a) or (b) of this section used for resins for which you are not claiming compliance under this option.

(d) Use resins and gel coats that do not exceed the maximum organic HAP contents shown in Table 3 to this subpart.

15. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5835 What are my general requirements for complying with this subpart?

A. State and Federally Enforcable Section (continued)

(a) You must be in compliance at all times with the work practice standards in Table 4 to this subpart, as well as the organic HAP emissions limits in Tables 3, or 5, or the organic HAP content limits in Table 7 to this subpart, as applicable, that you are meeting without the use of add-on controls.

(b) You must be in compliance with all organic HAP emissions limits in this subpart that you meet using add-on controls, except during periods of startup, shutdown, and malfunction.

(c) You must always operate and maintain your affected source, including air pollution control and monitoring equipment, according to the provisions in Section 63.6(e)(1)(i).

(d) You must develop and implement a written startup, shutdown, and malfunction plan according to the provisions in Section 63.6(e)(3) for any organic HAP emissions limits you meet using an add-on control.

16. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5840 By what date must I conduct a performance test or other initial compliance demonstration?

You must conduct performance tests, performance evaluations, design evaluations, capture efficiency testing, and other initial compliance demonstrations by the compliance date specified in Table 2 to this subpart, with three exceptions. Open molding and centrifugal casting operations that elect to meet a organic HAP emissions limit on a 12-month rolling average must initiate collection of the required data on the compliance date, and demonstrate compliance 1 year after the compliance date. New sources that use add-on controls to initially meet compliance must demonstrate compliance within 180 days after their compliance date.

17. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5845 When must I conduct subsequent performance tests?

You must conduct a performance test every 5 years following the initial performance test for any standard you meet with an add-on control device.

18. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5850 How do I conduct performance tests, performance evaluations, and design evaluations?

(a) If you are using any add-on controls to meet a organic HAP emissions limit in this subpart, you must conduct each performance test, performance evaluation, and design evaluation in 40 CFR part 63, subpart SS, that applies to you. The basic requirements for performance tests, performance evaluations, and design evaluations are presented in Table 6 to this subpart.

(b) Each performance test must be conducted according to the requirements in Section 63.7(e)(1) and under the specific conditions that 40 CFR part 63, subpart SS, specifies.

(c) Each performance evaluation must be conducted according to the requirements in Section 63.8(e) as applicable and under the specific conditions that 40 CFR part 63, subpart SS, specifies.

(d) You may not conduct performance tests or performance evaluations during periods of startup, shutdown, or malfunction, as specified in Section 63.7(e)(1).

(e) You must conduct the control device performance test using the emission measurement methods specified in paragraphs (e)(1) through (5) of this section.

(1) Use either Method 1 or 1A of appendix A to 40 CFR part 60, as appropriate, to select the sampling sites.

(2) Use Method 2, 2A, 2C, 2D, 2F or 2G of appendix A to 40 CFR part 60, as appropriate, to measure gas volumetric flow rate.

A. State and Federally Enforcable Section (continued)

(3) Use Method 18 of appendix A to 40 CFR part 60 to measure organic HAP emissions or use Method 25A of appendix A to 40 CFR part 60 to measure total gaseous organic emissions as a surrogate for total organic HAP emissions. If you use Method 25A, you must assume that all gaseous organic emissions measured as carbon are organic HAP emissions. If you use Method 18 and the number of organic HAP in the exhaust stream exceeds five, you must take into account the use of multiple chromatographic columns and analytical techniques to get an accurate measure of at least 90 percent of the total organic HAP mass emissions. Do not use Method 18 to measure organic HAP emissions from a combustion device; use instead Method 25A and assume that all gaseous organic mass emissions measured as carbon are organic HAP emissions.

(4) You may use American Society for Testing and Materials (ASTM) D6420-99 (available for purchase from at least one of the following addresses: 100 Barr Harbor Drive, West Conshohocken, PA 19428-2959; or University Microfilms International, 300 North Zeeb Road, Ann Arbor, MI 48106.) in lieu of Method 18 of 40 CFR part 60, appendix A, under the conditions specified in paragraphs (c)(4)(i) through (iii) of this section.

(i) If the target compound(s) is listed in Section 1.1 of ASTM D6420-99 and the target concentration is between 150 parts per billion by volume and 100 parts per million by volume.

(ii) If the target compound(s) is not listed in Section 1.1 of ASTM D6420-99, but is potentially detected by mass spectrometry, an additional system continuing calibration check after each run, as detailed in Section 10.5.3 of ASTM D6420-99, must be followed, met, documented, and submitted with the performance test report even if you do not use a moisture condenser or the compound is not considered soluble.

(iii) If a minimum of one sample/analysis cycle is completed at least every 15 minutes.

(5) Use the procedures in EPA Method 3B of appendix A to 40 CFR part 60 to determine an oxygen correction factor if required by Section 63.997(e)(2)(iii)(C). You may use American Society of Mechanical Engineers (ASME) PTC 19-10-1981-Part 10 (available for purchase from ASME, P.O. Box 2900, 22 Law Drive, Fairfield, New Jersey, 07007-2900, or online at www.asme.org/catalog) as an alternative to EPA Method 3B of appendix A to 40 CFR part 60.

(f) The control device performance test must consist of three runs and each run must last at least 1 hour. The production conditions during the test runs must represent normal production conditions with respect to the types of parts being made and material application methods. The production conditions during the test must also represent maximum potential emissions with respect to the organic HAP content of the materials being applied and the material application rates.

(g) If you are using a concentrator/oxidizer control device, you must test the combined flow upstream of the concentrator, and the combined outlet flow from both the oxidizer and the concentrator to determine the overall control device efficiency. If the outlet flow from the concentrator and oxidizer are exhausted in separate stacks, you must test both stacks simultaneously with the inlet to the concentrator to determine the overall control device efficiency.

(h) During the test, you must also monitor and record separately the amounts of production resin, tooling resin, pigmented gel coat, clear gel coat, and tooling gel coat applied inside the enclosure that is vented to the control device.

19. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5855 What are my monitor installation and operation requirements?

You must monitor and operate all add-on control devices according to the procedures in 40 CFR part 63, subpart SS.

20. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5860 How do I demonstrate initial compliance with the standards?

A. State and Federally Enforcable Section (continued)

(a) You demonstrate initial compliance with each organic HAP emissions standard in paragraphs (a) through (h) of Section 63.5805 that applies to you by using the procedures shown in Tables 8 and 9 to this subpart.

(b) If using an add-on control device to demonstrate compliance, you must also establish each control device operating limit in 40 CFR part 63, subpart SS, that applies to you.

21. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5895 How do I monitor and collect data to demonstrate continuous compliance?

(a) During production, you must collect and keep a record of data as indicated in 40 CFR part 63, subpart SS, if you are using an add-on control device.

(b) You must monitor and collect data as specified in paragraphs (b)(1) through (4) of this section.

(1) Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), you must conduct all monitoring in continuous operation (or collect data at all required intervals) at all times that the affected source is operating.

(2) You may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes to this subpart, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. You must use all the data collected during all other periods in assessing the operation of the control device and associated control system.

(3) At all times, you must maintain necessary parts for routine repairs of the monitoring equipment.

(4) A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring equipment to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(c) You must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP emissions limits based on an organic HAP emissions limit in Tables 3 or 5 to this subpart. You must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP content limits in Table 7 to this subpart if you are averaging organic HAP contents. Resin use records may be based on purchase records if you can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier.

(d) If you initially demonstrate that all resins and gel coats individually meet the applicable organic HAP emissions limits, or organic HAP content limits, then resin and gel coat use records are not required. However, you 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 shown in Tables 3 or 7 to this subpart. If after this initial demonstration, you change to a higher organic HAP resin or gel coat, or increase the resin or gel coat organic HAP content, or change to a higher-emitting resin or gel coat application method, then you must either again demonstrate that all resins and gel coats still meet the applicable organic HAP emissions limits, or begin collecting resin and gel coat use records and calculate compliance on a 12-month rolling average.

(e) For each of your pultrusion machines, you must record all times that wet area enclosures doors or covers are open and there is resin present in the resin bath.

22. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5900 How do I demonstrate continuous compliance with the standards?

A. State and Federally Enforcable Section (continued)

(a) You must demonstrate continuous compliance with each standard in 40 CFR 63.5805 that applies to you according to the methods specified in paragraphs (a)(1) through (3) of this section.

(1) Compliance with organic HAP emissions limits for sources using add-on control devices is demonstrated following the procedures in 40 CFR Part 63, Subpart SS. Sources using add-on controls may also use continuous emissions monitors to demonstrate continuous compliance as an alternative to control parameter monitoring.

(2) Compliance with organic HAP emissions limits is demonstrated by maintaining a organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Tables 3, or 5 to this subpart, on a 12-month rolling average, or by including in each compliance report a statement that all resins and gel coats meet the appropriate organic HAP emissions limits, as discussed in 40 CFR 63.5895(d).

(3) Compliance with organic HAP content limits in Table 7 to this subpart is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 7 to this subpart, on a 12-month rolling average, or by including in each compliance report a statement that all resins and gel coats individually meet the appropriate organic HAP content limits, as discussed in Section 63.5895(d).

(4) Compliance with the work practice standards in Table 4 to this subpart is demonstrated by performing the work practice required for your operation.

(b) You must report each deviation from each standard in 40 CFR 63.5805 that applies to you. The deviations must be reported according to the requirements in 40 CFR 63.5910.

(c) Except as provided in paragraph (d) of this section, during periods of startup, shutdown or malfunction, you must meet the organic HAP emissions limits and work practice standards that apply to you.

(d) When you use an add-on control device to meet standards in 40 CFR 63.5805, you are not required to meet those standards during periods of startup, shutdown, or malfunction, but you must operate your affected source in accordance with the startup, shutdown, and malfunction plan.

(e) Consistent with 40 CFR 63.6(e) and 63.7(e)(1), deviations that occur during a period of malfunction for those affected sources and standards specified in paragraph (d) of this section are not violations if you demonstrate to the Administrator's satisfaction that you were operating in accordance with the startup, shutdown, and malfunction plan. The Administrator will determine whether deviations that occur during a period of startup, shutdown, and malfunction are violations, according to the provisions in 40 CFR 63.6(e).

23. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5905 What notifications must I submit and when?

(a) You must submit all of the notifications in Table 13 to this subpart that apply to you by the dates specified in Table 13 to this subpart. The notifications are described more fully in 40 CFR part 63, subpart A, referenced in Table 13 to this subpart.

(b) If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change.

A. State and Federally Enforcable Section (continued)

24. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5910 What reports must I submit and when?

(a) You must submit each report in Table 14 to this subpart that applies to you.

(b) Unless the Administrator has approved a different schedule for submission of reports under Section 63.10(a), you must submit each report by the date specified in Table 14 to this subpart and according to paragraphs (b)(1) through (5) of this section.

(1) The first compliance report must cover the period beginning on the compliance date that is specified for your affected source in Section 63.5800 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in Section 63.5800.

(2) The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for your affected source in Section 63.5800.

(3) 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.

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

(5) For each affected source that is subject to permitting requirements pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to Section 70.6 (a)(3)(iii)(A) or Section 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section.

(c) The compliance report must contain the information in paragraphs (c)(1) through (6) of this section:

(1) Company name and address.

(2) 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.

(3) Date of the report and beginning and ending dates of the reporting period.

(4) If you had a startup, shutdown, or malfunction during the reporting period and you took actions consistent with your startup, shutdown, and malfunction plan, the compliance report must include the information in Section 63.10(d)(5)(i).

A. State and Federally Enforcable Section (continued)

(5) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, and there are no deviations from the requirements for work practice standards in Table 4 to this subpart, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.

(6) If there were no periods during which the continuous monitoring system (CMS), including a continuous emissions monitoring system (CEMS) and an operating parameter monitoring system were out of control, as specified in Section 63.8(c)(7), a statement that there were no periods during which the CMS was out of control during the reporting period.

(d) For each deviation from a organic HAP emissions limitation (i.e., emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source where you are not using a CMS to comply with the organic HAP emissions limitations or work practice standards in this subpart, the compliance report must contain the information in paragraphs (c)(1) through (4) of this section and in paragraphs (d)(1) and (2) of this section. This includes periods of startup, shutdown, and malfunction.

(1) The total operating time of each affected source during the reporting period.

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

(e) For each deviation from a organic HAP emissions limitation (i.e., emissions limit and operating limit) occurring at an affected source where you are using a CMS to comply with the organic HAP emissions limitation in this subpart, you must include the information in paragraphs (c)(1) through (4) of this section and in paragraphs (e)(1) through (12) of this section. This includes periods of startup, shutdown, and malfunction.

(1) The date and time that each malfunction started and stopped.

(2) The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks.

(3) The date, time, and duration that each CMS was out of control, including the information in Section 63.8(c)(8).

(4) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction, or during another period.

(5) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.

(6) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

(7) A summary of the total duration of CMS downtime during the reporting period and the total duration of CMS downtime as a percent of the total source operating time during that reporting period.

A. State and Federally Enforcable Section (continued)

(8) An identification of each organic HAP that was monitored at the affected source.

(9) A brief description of the process units.

(10) A brief description of the CMS.

(11) The date of the latest CMS certification or audit.

(12) A description of any changes in CMS, processes, or controls since the last reporting period.

(f) You must report if you have exceeded the 100 tpy organic HAP emissions threshold if that exceedance would make your facility subject to Section 63.5805(b) or (d). Include with this report any request for an exemption under Section 63.5805(e). If you receive an exemption under Section 63.5805(e) and subsequently exceed the 100 tpy organic HAP emissions threshold, you must report this exceedance as required in Section 63.5805(f).

(g) 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 this subpart in the semiannual monitoring report required by Section 70.6(a)(3)(iii)(A) or Section 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 to this subpart along with, or as part of, the semiannual monitoring report required by Section 70.6(a)(3)(iii)(A) or Section 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 this subpart, 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.

(h) Submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in Table 14 to this subpart, and not based on the requirements in Section 63.999.

25. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5915 What records must I keep?

(a) You must keep the records listed in paragraphs (a)(1) through (3) of this section.

(1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirements in Section 63.10(b)(2)(xiv).

(2) The records in Section 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.

(3) Records of performance tests, design, and performance evaluations as required in Section 63.10(b)(2).

(b) If you use an add-on control device, you must keep all records required in 40 CFR part 63, subpart SS, to show continuous compliance with this subpart.

(c) You must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3, 5, and 7 to this subpart.

A. State and Federally Enforcable Section (continued)

(d) You must keep a certified statement that you are in compliance with the work practice requirements in Table 4 to this subpart, as applicable.

(e) For a new or existing continuous lamination/ casting operation, you must keep the records listed in paragraphs (e)(1) through (4) of this section, when complying with the percent reduction and/or lbs/ton requirements specified in paragraphs (a) through (d) of Section 63.5805.

(1) You must keep all data, assumptions, and calculations used to determine percent reduction and/or lbs/ton as applicable;

(2) You must keep a brief description of the rationale for the assignment of an equation or factor to each formula;

(3) When using facility-specific organic HAP emissions estimation equations or factors, you must keep all data, assumptions, and calculations used to derive the organic HAP emissions estimation equations and factors and identification and rationale for the worst-case formula; and

(4) For all organic HAP emissions estimation equations and organic HAP emissions factors, you must keep documentation that the appropriate permitting authority has approved them.

26. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5920 In what form and how long must I keep my records?

(a) You must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to Section 63.10(b)(1).

(b) As specified in Section 63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to Section 63.10(b)(1). You can keep the records offsite for the remaining 3 years.

(d) You may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

27. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5925 What parts of the General Provisions apply to me?

Table 15 to this subpart shows which parts of the General Provisions in Sections 63.1 through 63.15 apply to you.

28. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5930 Who implements and enforces this subpart?

A. State and Federally Enforcable Section (continued)

(a) This subpart can be administered by us, the EPA, or a delegated authority such as your State, local, or tribal agency. If the EPA Administrator has delegated authority to your State, local, or tribal agency, then that agency has the authority to administer and enforce this subpart. You should contact your EPA Regional Office to find out if this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are not delegated.

(c) The authorities that will not be delegated to State, local, or tribal agencies are listed in paragraphs (c)(1) through (4) of this section:

(1) Approval of alternatives to the organic HAP emissions standards in Section 63.5805 under Section 63.6(g).

(2) Approval of major changes to test methods under Section 63.7(e)(2)(ii) and (f) and as defined in Section 63.90.

(3) Approval of major changes to monitoring under Section 63.8(f) and as defined in Section 63.90.

(4) Approval of major changes to recordkeeping and reporting under Section 63.10(f) and as defined in Section 63.90.

29. 40 CFR, Part 63, Subpart WWWW, NESHAPS for Reinforced Plastics Composites Production

Section 63.5935 What definitions apply to this subpart?

Terms used in this subpart are defined in the CAA, in 40 CFR 63.2, and in this section as follows:

Atomized mechanical application means application of resin or gel coat with spray equipment that separates the liquid into a fine mist. This fine mist may be created by forcing the liquid under high pressure through an elliptical orifice, bombarding a liquid stream with directed air jets, or a combination of these techniques.

Bulk molding compound (BMC) means a putty-like molding compound containing resin(s) in a form that is ready to mold. In addition to resins, BMC may contain catalysts, fillers, and reinforcements. Bulk molding compound can be used in compression molding and injection molding operations to manufacture reinforced plastic composites products.

BMC manufacturing means a process that involves the preparation of BMC.

Centrifugal casting means a process for fabricating cylindrical composites, such as pipes, in which composite materials are positioned inside a rotating hollow mandrel and held in place by centrifugal forces until the part is sufficiently cured to maintain its physical shape.

Charge means the amount of SMC or BMC that is placed into a compression or injection mold necessary to complete one mold cycle.

A. State and Federally Enforcable Section (continued)

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

Clear production gel coat means an unpigmented, quick-setting resin used to improve the surface appearance and/or performance of composites. It can be used to form the surface layer of any composites other than those used for molds in tooling operations.

Closed molding means a grouping of processes for fabricating composites in a way that HAP-containing materials are not exposed to the atmosphere except during the material loading stage (e.g., compression molding, injection molding, and resin transfer molding). Processes where the mold is covered with plastic (or equivalent material) prior to resin application, and the resin is injected into the covered mold are also considered closed molding.

Composite means a shaped and cured part produced by using composite materials.

Composite materials means the raw materials used to make composites. The raw materials include styrene containing resins. They may also include gel coat, monomer, catalyst, pigment, filler, and reinforcement.

Compression molding means a closed molding process for fabricating composites in which composite materials are placed inside matched dies that are used to cure the materials under heat and pressure without exposure to the atmosphere. The addition of mold paste or in-mold coating is considered part of the closed molding process. The composite materials used in this process are generally SMC or BMC.

Compression/injection molding means a grouping of processes that involves the use of compression molding and/or injection molding.

Continuous casting means a continuous process for fabricating composites in which composite materials are placed on an in-line conveyor belt to produce cast sheets that are cured in an oven.

Continuous lamination means a continuous process for fabricating composites in which composite materials are typically sandwiched between plastic films, pulled through compaction rollers, and cured in an oven. This process is generally used to produce flat or corrugated products on an in-line conveyor.

Continuous lamination/casting means a grouping of processes that involves the use of continuous lamination and/or continuous casting.

A. State and Federally Enforcable Section (continued)

Controlled emissions means those organic HAP emissions that are vented from a control device to the atmosphere.

Corrosion-resistant gel coat means a gel coat used on a product made with a corrosion-resistant resin that has a corrosion-resistant end-use application.

Corrosion-resistant end-use applications means applications where the product is manufactured specifically for an application that requires a level of chemical inertness or resistance to chemical attack above that required for typical reinforced plastic composites products. These applications include, but are not limited to, chemical processing and storage; pulp and paper production; sewer and wastewater treatment; power generation; potable water transfer and storage; food and drug processing; pollution or odor control; metals production and plating; semiconductor manufacturing; petroleum production, refining, and storage; mining; textile production; nuclear materials storage; swimming pools; and cosmetic production, as well as end-use applications that require high strength resins.

Corrosion-resistant industry standard includes the following standards: ASME RTP-1 or Sect. X; ASTM D5364, D3299, D4097, D2996, D2997, D3262, D3517, D3754, D3840, D4024, D4160, D4161, D4162, D4184, D3982, or D3839; ANSI/AWWA C950; UL 215, 1316 or 1746, IAPMO PS-199, or written customer requirements for resistance to specified chemical environments.

Corrosion-resistant product means a product made with a corrosion-resistant resin and is manufactured to a corrosion-resistant industry standard, or a food contact industry standard, or is manufactured for corrosion-resistant end-use applications involving continuous or temporary chemical exposures.

Corrosion-resistant resin means a resin that either:

(1) Displays substantial retention of mechanical properties when undergoing ASTM C-581 coupon testing, where the resin is exposed for 6 months or more to one of the following materials: material with a pH 12.0 or 3.0, oxidizing or reducing agents, organic solvents, or fuels or additives as defined in 40 CFR Section 79.2. In the coupon testing, the exposed resin needs to demonstrate a minimum of 50 percent retention of the relevant mechanical property compared to the same resin in unexposed condition. In addition, the exposed resin needs to demonstrate an increased retention of the relevant mechanical property of at least 20 percentage points when compared to a similarly exposed general-purpose resin. For example, if the general-purpose resin retains 45 percent of the relevant property when tested as specified above, then a corrosion-resistant resin needs to retain at least 65 percent (45 percent plus 20 percent) of its property. The general-purpose resin used in the test needs to have an average molecular weight of greater than 1,000, be formulated with a 1:2 ratio of maleic anhydride to phthalic anhydride and 100 percent diethylene glycol, and a styrene content between 43 to 48 percent; or

A. State and Federally Enforcable Section (continued)

(2) Complies with industry standards that require specific exposure testing to corrosive media, such as UL 1316, UL 1746, or ASTM F-1216.

Doctor box means the box or trough on an SMC machine into which the liquid resin paste is delivered before it is metered onto the carrier film.

Filament application means an open molding process for fabricating composites in which reinforcements are fed through a resin bath and wound onto a rotating mandrel. The materials on the mandrel may be rolled out or worked by using nonmechanical tools prior to curing. Resin application to the reinforcement on the mandrel by means other than the resin bath, such as spray guns, pressure-fed rollers, flow coaters, or brushes is not considered filament application.

Filled Resin means that fillers have been added to a resin such that the amount of inert substances is at least 10 percent by weight of the total resin plus filler mixture. Filler putty made from a resin is considered a filled resin.

Fillers means inert substances dispersed throughout a resin, such as calcium carbonate, alumina trihydrate, hydrous aluminum silicate, mica, feldspar, wollastonite, silica, and talc. Materials that are not considered to be fillers are glass fibers or any type of reinforcement and microspheres.

Fire retardant gel coat means a gel coat used for products for which low-flame spread/low-smoke resin is used.

Fluid impingement technology means a spray gun that produces an expanding non-misting curtain of liquid by the impingement of low-pressure uninterrupted liquid streams.

Food contact industry standard means a standard related to food contact application contained in Food and Drug Administration's regulations at 21 CFR 177.2420.

Gel Coat means a quick-setting resin used to improve surface appearance and/or performance of composites. It can be used to form the surface layer of any composites other than those used for molds in tooling operations.

Gel coat application means a process where either clear production, pigmented production, white/off-white or tooling gel coat is applied.

HAP-containing materials storage means an ancillary process which involves keeping HAP-containing materials, such as resins, gel coats, catalysts, monomers, and cleaners, in containers or bulk storage tanks for any length of time. Containers may include small tanks, totes, vessels, and buckets.

High Performance gel coat means a gel coat used on products for which National Science Foundation, United States Department of Agriculture, ASTM, durability, or other property testing is required.

High strength gel coat means a gel coat applied to a product that requires high strength resin.

High strength resins means polyester resins which have a casting tensile strength of 10,000 pounds per square inch or more and which are used for manufacturing products that have high strength requirements such as structural members and utility poles.

Injection molding means a closed molding process for fabricating composites in which composite materials are injected under pressure into a heated mold cavity that represents the exact shape of the product. The composite materials are cured in the heated mold cavity.

A. State and Federally Enforcable Section (continued)

Low Flame Spread/Low Smoke Products means products that meet the following requirements. The products must meet both the applicable flame spread requirements and the applicable smoke requirements. Interior or exterior building application products must meet an ASTM E-84 Flame Spread Index of less than or equal to 25, and Smoke Developed Index of less than or equal to 450, or pass National Fire Protection Association 286 Room Corner Burn Test with no flash over and total smoke released not exceeding 1000 meters square. Mass transit application products must meet an ASTM E-162 Flame Spread Index of less than or equal to 35 and ASTM E662 Smoke Density Ds @ 1.5 minutes less than or equal to 100 and Ds @ 4 minutes less than to equal to 200. Duct application products must meet ASTM E084 Flame Spread Index less than or equal to 25 and Smoke Developed Index less than or equal to 50 on the interior and/or exterior of the duct.

Manual resin application means an open molding process for fabricating composites in which composite materials are applied to the mold by pouring or by using hands and nonmechanical tools, such as brushes and rollers. Materials are rolled out or worked by using nonmechanical tools prior to curing. The use of pressure-fed rollers and flow coaters to apply resin is not considered manual resin application.

Mechanical resin application means an open molding process for fabricating composites in which composite materials (except gel coat) are applied to the mold by using mechanical tools such as spray guns, pressure-fed rollers, and flow coaters. Materials are rolled out or worked by using nonmechanical tools prior to curing.

Mixing means the blending or agitation of any HAP-containing materials in vessels that are 5.00 gallons (18.9 liters) or larger. Mixing may involve the blending of resin, gel coat, filler, reinforcement, pigments, catalysts, monomers, and any other additives.

Mold means a cavity or matrix into or onto which the composite materials are placed and from which the product takes its form.

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

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

Nonatomized mechanical application means the use of application tools other than brushes to apply resin and gel coat where the application tool has documentation provided by its manufacturer or user that this design of the application tool has been organic HAP emissions tested, and the test results showed that use of this application tool results in organic HAP emissions that are no greater than the organic HAP emissions predicted by the applicable nonatomized application equation(s) in Table 1 to this subpart. In addition, the device must be operated according to the manufacturer's directions, including instructions to prevent the operation of the device at excessive spray pressures. Examples of nonatomized application include flow coaters, pressure fed rollers, and fluid impingement spray guns.

A. State and Federally Enforcable Section (continued)

Noncorrosion-resistant resin means any resin other than a corrosion-resistant resin or a tooling resin.

Noncorrosion-resistant product means any product other than a corrosion-resistant product or a mold.

Non-routine manufacture means that you manufacture parts to replace worn or damaged parts of a reinforced plastic composites product, or a product containing reinforced plastic composite parts, that was originally manufactured in another facility. For a part to qualify as non-routine manufacture, it must be used for repair or replacement, and the manufacturing schedule must be based on the current or anticipated repair needs of the reinforced plastic composites product, or a product containing reinforced plastic composite parts.

Operation means a specific process typically found at a reinforced plastic composites facility. Examples of operations are noncorrosion-resistant manual resin application, corrosion-resistant mechanical resin application, pigmented gel coat application, mixing and HAP-containing materials storage.

Operation group means a grouping of individual operations based primarily on mold type. Examples are open molding, closed molding, and centrifugal casting.

Open molding means a process for fabricating composites in a way that HAP-containing materials are exposed to the atmosphere. Open molding includes processes such as manual resin application, mechanical resin application, filament application, and gel coat application. Open molding also includes application of resins and gel coats to parts that have been removed from the open mold.

Pigmented gel coat means a gel coat that has a color, but does not contain 10 percent or more titanium dioxide by weight. It can be used to form the surface layer of any composites other than those used for molds in tooling operations.

Polymer casting means a process for fabricating composites in which composite materials are ejected from a casting machine or poured into an open, partially open, or closed mold and cured. After the composite materials are poured into the mold, they are not rolled out or worked while the mold is open. The composite materials may or may not include reinforcements. Products produced by the polymer casting process include cultured marble products and polymer concrete.

Preform Injection means a form of pultrusion where liquid resin is injected to saturate reinforcements in an enclosed system containing one or more chambers with openings only large enough to admit reinforcements. Resin, which drips out of the chamber(s) during the process, is collected in closed piping or covered troughs and then into a covered reservoir for recycle. Resin storage vessels. reservoirs, transfer systems, and collection systems are covered or shielded from the ambient air. Preform injection differs from direct die injection in that the injection chambers are not directly attached to the die.

Prepreg materials means reinforcing fabric received precoated with resin which is usually cured through the addition of heat.

Pultrusion means a continuous process for manufacturing composites that have a uniform cross-sectional shape. The process consists of pulling a fiber-reinforcing material through a resin impregnation chamber or bath and through a shaping die, where the resin is subsequently cured. There are several types of pultrusion equipment, such as open bath, resin injection, and direct die injection equipment.

Repair means application of resin or gel coat to a part to correct a defect, where the resin or gel coat application occurs after the part has gone through all the steps of its typical production process, or the application occurs outside the normal production area. For purposes of this subpart, rerouting a part back through the normal production line, or part of the normal production line, is not considered repair.

A. State and Federally Enforcable Section (continued)

Resin transfer molding means a process for manufacturing composites whereby catalyzed resin is transferred or injected into a closed mold in which fiberglass reinforcement has been placed.

Sheet molding compound (SMC) means a ready-to-mold putty-like molding compound that contains resin(s) processed into sheet form. The molding compound is sandwiched between a top and a bottom film. In addition to resin(s), it may also contain catalysts, fillers, chemical thickeners, mold release agents, reinforcements, and other ingredients. Sheet molding compound can be used in compression molding to manufacture reinforced plastic composites products.

Shrinkage controlled resin means a resin that when promoted, catalyzed, and filled according to the resin manufacturer's recommendations demonstrates less than 0.3 percent linear shrinkage when tested according to ASTM D2566.

SMC manufacturing means a process which involves the preparation of SMC.

Tooling gel coat means a gel coat that is used to form the surface layer of molds. Tooling gel coats generally have high heat distortion temperatures, low shrinkage, high barcol hardness, and high dimensional stability.

Tooling resin means a resin that is used to produce molds. Tooling resins generally have high heat distortion temperatures, low shrinkage, high barcol hardness, and high dimensional stability.

Uncontrolled oven organic HAP emissions means those organic HAP emissions emitted from the oven through closed vent systems to the atmosphere and not to a control device. These organic HAP emissions do not include organic HAP emissions that may escape into the workplace through the opening of panels or doors on the ovens or other similar fugitive organic HAP emissions in the workplace.

Uncontrolled wet-out area organic HAP emissions means any or all of the folloWing: organic HAP emissions from wet-out areas that do not have any capture and control, organic HAP emissions that escape from wet-out area enclosures, and organic HAP emissions from wet-out areas that are captured by an enclosure but are vented to the atmosphere and not to an add-on control device.

Unfilled means that there has been no addition of fillers to a resin or that less than 10 percent of fillers by weight of the total resin plus filler mixture has been added.

Vapor suppressant means an additive, typically a wax, that migrates to the surface of the resin during curing and forms a barrier to seal in the styrene and reduce styrene emissions.

Vapor-suppressed resin means a resin containing a vapor suppressant added for the purpose of reducing styrene emissions during curing.

White and off-white gel coat means a gel coat that contains 10 percent of more titanium dioxide by weight.

B. State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

P002 - Gel Coat Station #2 (Green);
Z005 - Gel Coat Station #3 (Orange);
Z009 - Finishing;
Z010 - Pipe Attachment; and
Z011 - Roadways and Parking Areas.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Gel Coat Station #1 (Gray) (P004)

Activity Description: Spraying of gel coat onto molds (Gray) in South building.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Gel coat spraying station No. 1: spraying of gray gel coat (gel coat is a quick-setting resin used to improve surface appearance and/or performance of composites) into molds in the South building using a gel coating high volume low pressure atomizing spray gun to produce reinforced plastic composites utilizing gel coat, MEKP as catalyst, mold release, and acetone as clean-up solvent, with dry filtration system to control particulates.	OAC rule 3745-31-05(A)(3) (PTI 15-01457 issued 1/7/2003)	Styrene emissions from this emissions unit shall not exceed 37.1 lbs/hr. (The hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.) Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 37.9 lbs/hr. (The hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.) Organic compound (OC) emissions from this emissions unit shall not exceed 39.9 lbs/hr. (The hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.) Styrene emissions from this emissions unit shall not exceed 4.78 tons/yr. To achieve this limit, the maximum amount of gel coat usage for this emissions unit shall not exceed 32.5 tons per year based upon a rolling, 12-month summation of the gel coat usage rates.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
		VOC emissions from this emissions unit shall not exceed 4.78 tons/yr. To achieve this limit, the maximum amount of gel coat usage for this emissions unit shall not exceed 32.5 tons per year based upon a rolling, 12-month summation of the gel coat usage rates. (This limit does not include the VOC emissions generated by the usage of mold release.) OC emissions from this emissions unit shall not exceed 4.78 tons/yr. To achieve this limit, the maximum amount of gel coat usage for this emissions unit shall not exceed 32.5 tons per year based upon a rolling, 12-month summation of the gel coat usage rates. (This limit does not include OC emissions generated by the use of cleanup material and mold release.) The combined VOC emissions from the use of mold release from this entire facility shall not exceed 2.5 tons/yr based upon a rolling, 12-month summation of the VOC emissions. The combined OC emissions from the use of mold release and cleanup material from this entire facility shall not exceed 8.5 tons/yr based upon a rolling, 12-month summation of the OC emissions. Compliance with this rule also includes compliance with OAC rules 3745-17-07(A), 3745-17-07(B), 3745-17-08(B), and 3745-17-11(B). See sections A.II.1 through A.II.7.
	OAC rule 3745-15-07	See Part I, section A.20.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-17-07(B)(1)	Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	See section A.I.2.a.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 1.0 lb/hr.
	OAC rule 3745-21-07(G)(9)(g)	In accordance with OAC rule 3745-21-07(G)(9)(g), Best Available Technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).
	40 CFR Part 63, Subpart WWWW Reinforced Plastic Composites Production	See section A.I.2.b. See the Specific Facility Terms and Conditions - Part II sections A.3 through A.29 and Attachment 1.

2. Additional Terms and Conditions

2.a The reasonably available control measure(s) required by this rule shall include a dry filtration system with a collection efficiency that is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

2.b The NESHAP was promulgated on April 21, 2003 and the facility shall be subject to the rule as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the subpart, the permittee shall submit the following notifications:

i. Within 120 days after promulgation of 40 CFR Part 63, Subpart WWWW, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report, in accordance with 40 CFR Part 63.9(b)(2):

(a) the name and mailing address of the permittee;

(b) the physical location of the source if it is different from the mailing address;

(c) identification of the relevant MACT standard and the source's compliance date;

(d) a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each HAP; and

(e) a statement confirming the facility is a major source for HAPs.

2. Additional Terms and Conditions (continued)

ii. Within 60 days following completion of any required compliance demonstration activity specified in 40 CFR Part 63, Subpart WWWW, the permittee shall submit a notification of compliance status that contains the following information:

(a) the methods used to determine compliance;

(b) the results of any performance tests, visible emission observations, continuous monitoring systems performance evaluations, and/or other monitoring procedures or methods that were conducted;

(c) the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

(d) the type and quantity of HAPs emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR Part 63, Subpart WWWW;

(e) an analysis demonstrating whether the affected source is a major source or an area source;

(f) a description of the air pollution control equipment or method for each emission point, including each control device or method for each HAP and the control efficiency (percent) for each control device or method; and

(g) a statement of whether or not the permittee has complied with the requirements of 40 CFR Part 63, Subpart WWWW.

II. Operational Restrictions

1. The maximum styrene monomer weight percent, as applied, for each gel coat employed in this emissions unit shall not exceed thirty-three percent (33%).

II. Operational Restrictions (continued)

2. The maximum annual gel coat usage for this emissions unit shall not exceed 32.5 tons per year based upon a rolling, 12-month summation of the gel coat usage rates.

To ensure enforceability during the 12 calendar months following the issuance of Permit To Install (PTI) 15-01457 which was issued on 01/07/03, the permittee shall not exceed the gel coat usage rate specified in the following table:

Maximum Allowable Cumulative Tons of Gel Coat Usage:

Month(s).....	Ton(s)
1	2.7
1-2	5.4
1-3	8.1
1-4	10.8
1-5	13.5
1-6	16.2
1-7	18.9
1-8	21.6
1-9	24.3
1-10	27.0
1-11	29.7
1-12	32.5

After the first 12 calendar months following issuance of PTI 15-01457 which was issued on 01/07/03, compliance with the annual gel coat usage limitation for this emissions unit shall be based upon a rolling, 12-month summation of the tons of gel coat used.

3. The only cleanup material the permittee shall employ in this facility shall be acetone, which has a density of 6.6 lbs OC/gallon, as applied.

II. Operational Restrictions (continued)

4. The combined OC emissions from the use of mold release and cleanup material from this entire facility shall not exceed 8.5 tons/yr. based upon the rolling, 12-month summation of the OC emissions.

To ensure enforceability during the 12 calendar months following the issuance of PTI 15-01457 which was issued on 01/07/03, the permittee shall not exceed the OC emission rates from the use of cleanup material and mold release specified in the following table:

Maximum Allowable Cumulative OC Emission Rates from Cleanup Material & Mold Release Usage:

Month(s)	(tons)
1	0.71
1-2	1.42
1-3	2.13
1-4	2.84
1-5	3.55
1-6	4.25
1-7	4.96
1-8	5.67
1-9	6.38
1-10	7.09
1-11	7.80
1-12	8.50

After the first 12 calendar months following issuance of PTI 15-01457 which was issued on 01/07/03, compliance with the annual OC emission rates from the use of cleanup solvent and mold release for the entire facility shall be based upon a rolling, 12-month summation of the tons of OC emissions from the use of cleanup solvent and mold release.

5. The combined VOC emissions from the use of mold release from this entire facility shall not exceed 2.5 tons/yr based upon the rolling, 12-month summation of the VOC emissions.

To ensure enforceability during the 12 calendar months following the issuance of PTI 15-01457 which was issued on 01/07/03, the permittee shall not exceed the VOC emission rates from the use of mold release specified in the following table:

Maximum Allowable Cumulative VOC Emission Rates from Cleanup Material & Mold Release Usage:

Month(s).....	Ton(s)
1	0.20
1-2	0.41
1-3	0.62
1-4	0.83
1-5	1.04
1-6	1.25
1-7	1.46
1-8	1.67
1-9	1.88
1-10	2.09
1-11	2.30
1-12	2.50

After the first 12 calendar months following issuance of PTI 15-01457 which was issued on 01/07/03, compliance with the annual VOC emission rates from mold release usage for this entire facility shall be based upon a rolling, 12-month summation of the tons of VOC emissions from mold release usage.

II. Operational Restrictions (continued)

6. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

7. When emissions unit P004 is being operated, no more than two of the following emissions units may be operated concurrently: P005, P006, P007, and P008.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of the following information for this emissions unit:

a. the name and identification of each gel coat and cleanup material employed; and

b. the weight fraction of styrene monomer (in percent OC) for each gel coat, as applied.

2. The permittee shall collect and record the following information each month for this emissions unit:

a. the gel coat usage rate;

b. beginning after the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, the rolling, 12-month summation of the gel coat usage; and

c. during the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, the permittee shall record the cumulative gel coat usage rate for each calendar month.

3. The permittee shall collect and record the following information each month for the entire facility:

a. the company identification for each cleanup material employed;

b. the number of pounds of each cleanup material employed;

c. the OC content of each cleanup material employed, in pounds per gallon;

d. the total OC emission rate for each cleanup material employed, in pounds or tons;

e. the total OC emission rate for all cleanup materials employed, (summation of d), in tons; and

f. the annual, year-to-date OC emission rate for all cleanup materials employed, (summation of "e" for each calendar month to date from January to December), in tons.

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

OC emissions = (total gallons of cleanup material used) x (solvent density of cleanup material) - (total gallons of cleanup material sent off site [minus solids]) x (solvent density of cleanup material).

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall collect and record the following information each month for the entire facility:

a. the company identification for each mold release employed;

b. the number of gallons of each mold release employed;

c. the OC and VOC content of each mold release employed, in pounds per gallon;

d. the total OC and VOC emission rate for each mold release employed, (b x c), in pounds or tons;

e. the total OC and VOC emission rate for all mold release employed, (summation of d), in tons;

f. beginning after the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03 permit, the rolling, 12-month summation of the OC emission rates from cleanup material and mold release usage;

g. during the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, the permittee shall record the cumulative OC emission rates from cleanup material and mold release usage for each calendar month;

h. beginning after the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, the rolling, 12-month summation of the VOC emission rates from mold release usage; and

i. during the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, the permittee shall record the cumulative VOC emission rates from mold release usage rate for each calendar month.

5. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

6. Records shall be maintained when more than two of the following emission units are being operated with P004 concurrently: P005, P006, P007, P008.

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

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

*With the use of the dry filtration system, the particulate emissions from this emissions unit should be very minor; therefore, monthly visible emission checks should be sufficient to ensure ongoing compliance with the particulate emission limitations.

III. Monitoring and/or Record Keeping Requirements (continued)

8. The permittee shall perform monthly* checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions of fugitive dust from the building enclosing this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the location where the fugitive dust is escaping the building;
e. the total duration of any visible emission incident; and
f. any corrective actions taken to eliminate the visible emissions.

*With the use of the dry filtration system, the particulate emissions from this emissions unit should be very minor; therefore, monthly visible emission checks should be sufficient to ensure ongoing compliance with the particulate emission limitations.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the number of pounds of each cleanup material employed that was not acetone.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the number of pounds and the weight fraction of styrene monomer of any noncomplying gel coat (i.e., for weight fraction of monomer) that was employed.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month gel coat usage limitation of 32.5 tons/yr and, for the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, all exceedances of the maximum allowable cumulative gel coat usage.

4. The permittee shall notify the Canton local air agency in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days after the event.

5. The permittee shall submit quarterly deviation (excursion) reports that identify any times when emissions unit P004 was operating and more than two of the following emissions units were also operating concurrently: P005, P006, P007, and P008.

6. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month facility-wide VOC emissions limitation of 2.5 tons/yr from the usage of mold release and, for the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, all exceedances of the maximum allowable cumulative facility-wide VOC emissions limitation from the use of mold release.

7. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month facility-wide OC emissions limitation of 8.5 tons/yr from the usage of mold release and cleanup material and, for the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, all exceedances of the maximum allowable cumulative facility-wide OC emissions limitation from the use of mold release and cleanup material.

8. Except as otherwise specified, the above reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1)(c).

9. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Canton local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

IV. Reporting Requirements (continued)

10. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions of fugitive dust were observed escaping from the building enclosing this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Canton local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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:

Styrene emissions from this emissions unit shall not exceed 37.1 lbs/hr. (The hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.)

Applicable Compliance Method:

The hourly emissions limitation represents the potential to emit for this emissions unit, i.e., the maximum usage rate of 252.25 lbs of gel coat/hr and the maximum monomer weight percent allowed under the restrictions of this permit (33%).

The emission factor shall be calculated using Table 1 of Subpart WWWW for atomized spray gel coat application using a nonvapor-suppressed gel coat with maximum monomer weight percent of 33%.

Emission Factor = ((1.03646 x mass fraction styrene) - 0.195) x 2,000

Emission Factor = 294.1 lbs styrene emitted per ton of gel coat used

Hourly Styrene Emissions = 252.25 lbs gel coat/hr x 1 ton/2000 lbs x 294.1 lbs styrene/ton

Hourly Styrene Emissions = 37.1 lbs styrene/hr

Therefore, no additional requirements are necessary to show compliance with this limit.

V. Testing Requirements (continued)

1.b Emission Limitation:

VOC emissions from this emissions unit shall not exceed 37.9 lbs/hr. (The hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.)

Applicable Compliance Method:

The hourly emissions limitation represents the potential to emit for this emissions unit, i.e., the maximum usage rate of 252.25 lbs of gel coat/hr and the maximum monomer weight percent allowed under the restrictions of this permit (33%).

The emission factor shall be calculated using Table 1 of the subpart for atomized spray gel coat application using a nonvapor-suppressed gel coat with maximum monomer weight percent of 33%.

Emission Factor = ((1.03646 x mass fraction styrene) - 0.195) x 2,000

Emission Factor = 294.1 lbs styrene emitted per ton of gel coat used

Hourly Styrene Emissions = 252.25 lbs gel coat/hr x 1 ton/2000 lbs x 294.1 lbs styrene/ton

Hourly Styrene Emissions = 37.1 lbs styrene/hr

The average maximum VOC emissions from the use of mold release is 0.8 lb/hr.

Hourly VOC emissions = 37.1 lbs VOC/hr + 0.8 lb VOC/hr

Hourly VOC emissions = 37.9 lbs VOC/hr

Therefore, no additional requirements are necessary to show compliance with this limit.

V. Testing Requirements (continued)

1.c Emission Limitation:

OC emissions from this emissions unit shall not exceed 39.9 lbs/hr. (The hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.)

Applicable Compliance Method:

The hourly emissions limitation represents the potential to emit for this emissions unit, i.e., the maximum usage rate of 252.25 lbs of gel coat/hr and the maximum monomer weight percent allowed under the restrictions of this permit (33%).

The emission factor shall be calculated using Table 1 of the subpart for atomized spray gel coat application using a nonvapor-suppressed gel coat with maximum monomer weight percent of 33%.

Emission Factor = ((1.03646 x mass fraction styrene) - 0.195) x 2,000

Emission Factor = 294.1 lbs styrene emitted per ton of gel coat used

Hourly Styrene Emissions = 252.25 lbs gel coat/hr x 1 ton/2000 lbs x 294.1 lbs styrene/ton

Hourly Styrene Emissions = 37.1 lbs styrene/hr

The average maximum OC emissions from the use of mold release is 0.8 lb/hr.

The maximum OC emissions from the use of cleanup materials is 2 lbs/hr.

Hourly OC emissions = 37.1 lbs OC/hr + 0.8 lb OC/hr + 2 lbs OC/hr

Hourly OC emissions = 39.9 lbs OC/hr

Therefore, no additional requirements are necessary to show compliance with this limit.

1.d Emission Limitation:

Styrene emissions from this emissions unit shall not exceed 4.78 tons/yr. To achieve this limit, the maximum amount of gel coat usage for this emissions unit shall not exceed 32.5 tons per year based upon a rolling,12-month summation of the gel coat usage rates.

Applicable Compliance Method:

Annual Styrene Emissions = 32.5 tons/yr x 294.1 lbs/ton x 1 ton/2000 lbs

Annual Styrene Emissions = 4.78 tons/yr

Compliance shall be demonstrated by the monitoring and record keeping of gel coat usage found in section A.III.2.

V. Testing Requirements (continued)

1.e Emission Limitation:

VOC emissions from this emissions unit shall not exceed 4.78 tons/yr. To achieve this limit, the maximum amount of gel coat usage for this emissions unit shall not exceed 32.5 tons per year based upon a rolling, 12-month summation of the gel coat usage rates. (This limit does not include the VOC emissions generated by the use of mold release.)

Applicable Compliance Method:

Annual VOC Emissions = 32.5 tons/yr x 294.1 lbs/ton x 1 ton/2000 lbs

Annual VOC Emissions = 4.78 tons/yr

Compliance shall be demonstrated by the monitoring and record keeping of gel coat usage found in section A.III.2.

1.f Emission Limitation:

OC emissions from this emissions unit shall not exceed 4.78 tons/yr. To achieve this limit, the maximum amount of gel coat usage for this emissions unit shall not exceed 32.5 tons per year based upon a rolling, 12-month summation of the gel coat usage rates. (This limit does not include OC emissions generated by the use of cleanup material and mold release.)

Applicable Compliance Method:

Annual OC Emissions = 32.5 tons/yr x 294.1 lbs/ton x 1 ton/2000 lbs

Annual OC Emissions = 4.78 tons/yr

Compliance shall be demonstrated by the monitoring and record keeping of gel coat usage found in section A.III.2.

1.g Emission Limitation:

The combined VOC emissions from the use of mold release from this entire facility shall not exceed 2.5 tons/yr based upon a rolling, 12-month summation of the VOC emissions.

Applicable Compliance Method:

Compliance shall be demonstrated by monitoring and record keeping found in section A.III.4.

1.h Emission Limitation:

The combined OC emissions from the use of mold release and cleanup material from this entire facility shall not exceed 8.5 tons/yr based upon a rolling, 12-month summation of the OC emissions.

Applicable Compliance Method:

Compliance shall be demonstrated by monitoring and record keeping found in sections A.III.3 and A.III.4.

V. Testing Requirements (continued)

1.i Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with the method and procedures specified in OAC rule 3745-17-03(B)(1).

1.j Emission Limitation:

Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with the method and procedures specified in OAC rule 3745-17-03(B)(3).

1.k Emission Limitation:

Particulate emissions shall not exceed 1.0 lb/hr.

Applicable Compliance Method:

If required, compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

2. Compliance with the operational restrictions in section A.II of these terms and conditions shall be determined in accordance with the following methods:

2.a Operational Restriction:

The maximum amount of gel coat usage shall not exceed 32.5 tons/yr, based upon a rolling, 12-month summation of the gel coat usage.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of gel coat usage as specified in section A.III.2.

2.b Operational Restriction:

The maximum styrene monomer weight percent, as applied, for the gel coats employed in this emissions unit shall not exceed thirty-three percent (33%).

Applicable Compliance Method:

The percent styrene monomer content shall be determined in accordance with 40 CFR 63.5797. Compliance shall be achieved based on the monitoring and record keeping of gel coat usage as specified in section A.III.1.

V. Testing Requirements (continued)

2.c Operational Restriction:

The only cleanup material the permittee shall employ in this facility shall be acetone, which has a density of 6.6 lbs OC/gallon, as applied.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of gel coat usage as specified in section A.III.1.

2.d Operational Restriction:

The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of the use of the dry filtration system as specified in section A.III.5.

2.e Operational Restriction:

When emissions unit P004 is being operated, no more than two of the following emissions units may be operated concurrently: P005, P006, P007, and P008.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of emissions units operating schedules as specified in section A.III.6.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Gel coat spraying station No. 1: spraying of gray gel coat (gel coat is a quick-setting resin used to improve surface appearance and/or performance of composites) into molds in the South building using a gel coating high volume low pressure atomizing spray gun to produce reinforced plastic composites utilizing gel coat, MEKP as catalyst, mold release, and acetone as clean-up solvent, with dry filtration system to control particulates.		See section B.III.1.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for these five emissions units (P004, P005, P006, P007, and P008) for the emissions of styrene was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. Using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for "worst case" pollutant:

Pollutant: styrene

TLV (ug/m3): 85,200

Maximum Hourly Emission Rate from P004, P005, P006, P007, and P008 (lbs/hr): 81.66 lbs/hour

Predicted 1-Hour Maximum Ground-Level
Concentration at the Fenceline (ug/m3): 1,792

MAGLC (ug/m3): 2,028 (85,200 ug/m3 divided by 42)

III. Monitoring and/or Record Keeping Requirements (continued)

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials) or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV previously modeled;

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

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

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the changes(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (V)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Spray Lay-up Station #1 (P005)

Activity Description: Spraying of fiberglass and vapor suppressed resin onto molds (1 gun) in North building.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Spray lay-up station No. 1: mechanical, non-atomized spraying of fiberglass and vapor suppressed resin onto molds in the North building using one spray lay-up gun to produce reinforced plastic composites utilizing fiberglass, vapor suppressed resin, MEKP as catalyst, mold release, and acetone as clean-up solvent with dry filtration system to control particulate emissions.	OAC rule 3745-31-05(A)(3) (PTI 15-01457 issued 1/7/2003)	Styrene emissions from this emissions unit shall not exceed 22.2 lbs/hr. (The hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.) Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 23.9 lbs/hr. (The hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.) Organic compound (OC) emissions from this emissions unit shall not exceed 27.9 lbs/hr. (The hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.) Styrene emissions from this emissions unit shall not exceed 16.6 tons/yr.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
		VOC emissions from this emissions unit shall not exceed 19.11 tons/yr. OC emissions from this emissions unit shall not exceed 25.11 tons/yr. The combined styrene emissions from emissions units P005 and P006 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage. The combined VOC emissions from emissions units P005 and P006 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage. (This limit does not include VOC emissions generated by the use of mold release.) The combined OC emissions from emissions units P005 and P006 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage. (This limit does include OC emissions from cleanup material and mold release usage.) The combined VOC emissions from the use of mold release from this entire facility shall not exceed 2.5 tons/yr based upon a rolling, 12-month summation of the VOC emissions. The combined OC emissions from the use of mold release and cleanup material from this entire facility shall not exceed 8.5 tons/yr based upon a rolling, 12-month summation of the OC emissions.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
		Compliance with this rule also includes compliance with OAC rules 3745-17-07(A), 3745-17-07(B), 3745-17-08(B), and 3745-17-11(B). See sections A.II.1 through A.II.9.
	OAC rule 3745-15-07	See Part I, section B.7.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)(1)	Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	See section A.I.2.a.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 2.1 lbs/hr.
	OAC rule 3745-21-07(G)(9)(g)	In accordance with OAC rule 3745-21-07(G)(9)(g), Best Available Technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).
	40 CFR Part 63, Subpart WWWW Reinforced Plastic Composites Production	See section A.I.2.b. See the Specific Facility Terms and Conditions - Part II sections A.3 through A.29 and Attachment 1.

2. Additional Terms and Conditions

2.a The reasonably available control measure(s) required by this rule shall include a dry filtration system with a collection efficiency that is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

2. Additional Terms and Conditions (continued)

2.b The NESHAP was promulgated on April 21, 2003 and the facility shall be subject to the rule as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the subpart, the permittee shall submit the following notifications:

i. Within 120 days after promulgation of 40 CFR Part 63, Subpart WWWW, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report, in accordance with 40 CFR Part 63.9(b)(2):

(a) the name and mailing address of the permittee;

(b) the physical location of the source if it is different from the mailing address;

(c) identification of the relevant MACT standard and the source's compliance date;

(d) a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each HAP; and

(e) a statement confirming the facility is a major source for HAPs.

ii. Unless otherwise specified in the relevant Subpart, within 60 days following completion of any required compliance demonstration activity specified in the relevant Subpart, the permittee shall submit a notification of compliance status that contains the following information:

(a) the methods used to determine compliance;

(b) the results of any performance tests, visible emission observations, continuous monitoring systems performance evaluations, and/or other monitoring procedures or methods that were conducted;

(c) the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

(d) the type and quantity of HAPs emitted by the source, reported in units and averaging times in accordance with the test methods specified in the relevant Subpart;

(e) an analysis demonstrating whether the affected source is a major source or an area source;

(f) a description of the air pollution control equipment or method for each emission point, including each control device or method for each HAP and the control efficiency (percent) for each control device or method; and

(g) a statement of whether or not the permittee has complied with the requirements of the relevant Subpart.

II. Operational Restrictions

1. The maximum styrene monomer weight percent, as applied, for each resin employed in this emissions unit shall not exceed forty-four percent (44%).

II. Operational Restrictions (continued)

2. The maximum annual combined resin usage for emissions units P005 and P006 shall not exceed 375.2 tons per year based upon a rolling, 12-month summation of the resin usage rates.

To ensure enforceability during the 12 calendar months following the issuance of PTI 15-01457 which was issued on 01/07/03, the permittee shall not exceed the resin usage rate specified in the following table:

Maximum Allowable Cumulative Tons of Resin Usage:

Month(s).....	Ton(s)
1	31.3
1-2	62.5
1-3	93.8
1-4	125.1
1-5	156.3
1-6	187.6
1-7	218.9
1-8	250.1
1-9	281.4
1-10	312.7
1-11	343.9
1-12	375.2

After the first 12 calendar months following issuance of PTI 15-01457 which was issued on 01/07/03, compliance with the annual resin usage for emissions usage for emissions units P005 and P006 shall be based upon a rolling, 12-month summation of the tons of resin used.

3. The only cleanup material the permittee shall employ in this facility shall be acetone, which has a density of 6.6 lbs OC/gallon, as applied.

II. Operational Restrictions (continued)

4. The combined OC emissions from the use of mold release and cleanup material from this entire facility shall not exceed 8.5 tons/yr. based upon the rolling, 12-month summation of the OC emissions.

To ensure enforceability during the 12 calendar months following the issuance of PTI 15-01457 which was issued on 01/07/03, the permittee shall not exceed the OC emission rates from the use of cleanup material and mold release specified in the following table:

Maximum Allowable Cumulative OC Emission Rates from Cleanup Material & Mold Release Usage:

Month(s)	(tons)
1	0.71
1-2	1.42
1-3	2.13
1-4	2.84
1-5	3.55
1-6	4.25
1-7	4.96
1-8	5.67
1-9	6.38
1-10	7.09
1-11	7.80
1-12	8.50

After the first 12 calendar months following issuance of PTI 15-01457 which was issued on 01/07/03, compliance with the annual OC emission rates from the use of cleanup solvent and mold release for the entire facility shall be based upon a rolling, 12-month summation of the tons of OC emissions from the use of cleanup solvent and mold release.

5. The combined VOC emissions from the use of mold release from this entire facility shall not exceed 2.5 tons/yr based upon the rolling, 12-month summation of the VOC emissions.

To ensure enforceability during the 12 calendar months following the issuance of PTI 15-01457 which was issued on 01/07/03, the permittee shall not exceed the VOC emission rates from the use of mold release specified in the following table:

Maximum Allowable Cumulative VOC Emission Rates from Cleanup Material & Mold Release Usage:

Month(s).....	Ton(s)
1	0.20
1-2	0.41
1-3	0.62
1-4	0.83
1-5	1.04
1-6	1.25
1-7	1.46
1-8	1.67
1-9	1.88
1-10	2.09
1-11	2.30
1-12	2.50

After the first 12 calendar months following issuance of PTI 15-01457 which was issued on 01/07/03, compliance with the annual VOC emission rates from mold release usage for this entire facility shall be based upon a rolling, 12-month summation of the tons of VOC emissions from mold release usage.

II. Operational Restrictions (continued)

6. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

7. When emissions unit P005 is being operated, no more than two of the following emissions units may be operated concurrently: P004, P006, P007, and P008.

8. The permittee shall utilize Non-atomized Application Equipment in this emissions unit. Non-atomized Application Equipment means the following:

a. flow coat nozzles for gel coat application equipment;

b. flow coat nozzle and chopper chute for resin and glass application equipment; and

c. pressure fed roller equipment.

(For further details, see the CFA's "Controlled Spray Handbook dated 9/98".)

9. The permittee shall only employ vapor suppressant resins.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of the following information for this emissions unit:

a. the name and identification of each resin and cleanup material employed;

b. the weight fraction of styrene monomer (in percent) for each resin, as applied;

c. documentation that Non-atomized Application Equipment was employed; and

d. documentation that each resin employed was a vapor suppressant resin.

2. The permittee shall collect and record the following information each month for emissions units P005 and P006 as a group:

a. the combined resin usage rate;

b. beginning after the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, the rolling, 12-month summation of the combined resin usage; and

c. during the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, the permittee shall record the cumulative combined resin usage rate for each calendar month.

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each month for the entire facility:

a. the company identification for each cleanup material employed;

b. the number of pounds of each cleanup material employed;

c. the OC content of each cleanup material employed, in pounds per gallon;

d. the total OC emission rate for each cleanup material employed, in pounds or tons;

e. the total OC emission rate for all cleanup materials employed, (summation of d), in tons; and

f. the annual, year-to-date OC emission rate for all cleanup materials employed, (summation of "e" for each calendar month to date from January to December), in tons.

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

OC emissions = (total gallons of cleanup material used) x (solvent density of cleanup material) - (total gallons of cleanup material sent off site [minus solids]) x (solvent density of cleanup material).

4. The permittee shall collect and record the following information each month for the entire facility:

a. the company identification for each mold release employed;

b. the number of gallons of each mold release employed;

c. the OC and VOC content of each mold release employed, in pounds per gallon;

d. the total OC and VOC emission rate for each mold release employed, (b x c), in pounds or tons;

e. the total OC and VOC emission rate for all mold release employed, (summation of d), in tons;

f. beginning after the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, the rolling, 12-month summation of the OC emission rates from cleanup material and mold release usage;

g. during the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, the permittee shall record the cumulative OC emission rates from cleanup material and mold release usage for each calendar month;

h. beginning after the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, the rolling, 12-month summation of the VOC emission rates from mold release usage; and

i. during the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, the permittee shall record the cumulative VOC emission rates from mold release usage rate for each calendar month.

5. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

6. Records shall be maintained when more than two of the following emission units are being operated with P005 concurrently: P004, P006, P007, P008.

III. Monitoring and/or Record Keeping Requirements (continued)

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

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

*With the use of the dry filtration system, the particulate emissions from this emissions unit should be very minor; therefore, monthly visible emission checks should be sufficient to ensure ongoing compliance with the particulate emission limitations.

8. The permittee shall perform monthly* checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions of fugitive dust from the building enclosing this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the location where the fugitive dust is escaping the building;
e. the total duration of any visible emission incident; and
f. any corrective actions taken to eliminate the visible emissions.

*With the use of the dry filtration system, the particulate emissions from this emissions unit should be very minor; therefore, monthly visible emission checks should be sufficient to ensure ongoing compliance with the particulate emission limitations.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the number of pounds of each cleanup material employed that was not acetone.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the number of pounds of noncomplying resin (i.e., for weight fraction of styrene monomer) employed.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month resin combined usage limitation of 375.2 tons/yr for emissions units P005 and P006, and, for the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, all exceedances of the maximum allowable cumulative combined resin usage.

4. The permittee shall notify the Canton local air agency in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days after the event occurs.

5. The permittee shall submit quarterly deviation (excursion) reports that identify any times when emissions unit P005 was operating and more than two of the following emissions units were also operating concurrently: P004, P006, P007, and P008.

6. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month facility-wide VOC emissions limitation of 2.5 tons/yr from the usage of mold release and, for the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, all exceedances of the maximum allowable cumulative facility-wide VOC emissions limitation from the use of mold release.

IV. Reporting Requirements (continued)

7. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month facility-wide OC emissions limitation of 8.5 tons/yr from the usage of mold release and cleanup material and, for the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, all exceedances of the maximum allowable cumulative facility-wide OC emissions limitation from the use of mold release and cleanup material.

8. The permittee shall submit quarterly deviation (excursion) reports that identify any use of spray equipment by this emissions unit that did not meet the definition of Non-atomized Application Equipment found in section A.II.8.

9. The permittee shall submit quarterly deviation (excursion) reports that identify any use of resins that did not meet the definition of vapor suppressant resin.

10. Except as otherwise specified, the above reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1)(c).

11. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Canton local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

12. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions of fugitive dust were observed escaping from the building enclosing this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Canton local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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:

Styrene emissions from this emissions unit shall not exceed 22.2 lbs/hr. (This hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.)

Applicable Compliance Method:

The hourly emissions limitation represents the potential to emit for this emissions unit, i.e., the maximum usage rate of 500 lbs of resin/hr and the maximum monomer weight percent allowed under the restrictions of this permit (44%).

The emission factor shall be calculated using Table 1 of the subpart for mechanical non-atomized resin application using a vapor-suppressed resin with VSE factor of 0.3475 and with maximum monomer weight percent of 44%.

Emission Factor = ((0.157 x mass fraction styrene) - 0.0165) x 2,000 x (1 - (0.45 x VSE factor))

Emission Factor = 88.7 lbs styrene emitted per ton of resin used

Hourly Styrene Emissions = 500 lbs resin/hr x 1 ton/2000 lbs x 88.7 lbs styrene/ton

Hourly Styrene Emissions = 22.2 lbs styrene/hr

Therefore, no additional requirements are necessary to show compliance with this limit.

Note that after the VSE factor has been redetermined as provided by this permit, the redetermined value shall be used in this compliance calculation.

V. Testing Requirements (continued)

1.b Emission Limitation:

VOC emissions from this emissions unit shall not exceed 23.9 lbs/hr. (The hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.)

Applicable Compliance Method:

The hourly emissions limitation represents the potential to emit for this emissions unit, i.e., the maximum usage rate of 500 lbs of resin/hr and the maximum monomer weight percent allowed under the restrictions of this permit (44%).

The emission factor shall be calculated using Table 1 of the subpart for non-atomized mechanical resin application using a vapor-suppressed resin with VSE factor of 0.3475 and with maximum monomer weight percent of 44%.

Emission Factor = ((0.157 x mass fraction styrene) - 0.0165) x 2,000 x (1 - (0.45 x VSE factor))

Emission Factor = 88.7 lbs styrene emitted per ton of resin used

Hourly VOC Emissions = 500 lbs resin/hr x 1 ton/2000 lbs x 88.7 lbs styrene/ton

Hourly VOC Emissions = 22.2 lbs styrene/hr

The average maximum VOC emissions from the use of mold release is 1.7 lb/hr.

Hourly VOC emissions = 22.2 lbs VOC/hr + 1.7 lb VOC/hr

Hourly VOC emissions = 23.9 lbs VOC/hr

Therefore, no additional requirements are necessary to show compliance with this limit.

V. Testing Requirements (continued)

1.c Emission Limitation:

OC emissions from this emissions unit shall not exceed 27.9 lbs/hr. (This hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.)

Applicable Compliance Method:

The hourly emissions limitation represents the potential to emit for this emissions unit, i.e., the maximum usage rate of 500 lbs of resin/hr and the maximum monomer weight percent allowed under the restrictions of this permit (44%).

The emission factor shall be calculated using Table 1 of the subpart for non-atomized mechanical resin application using a vapor-suppressed resin with VSE factor of 0.3475 and with maximum monomer weight percent of 44%.

Emission Factor = ((0.157 x mass fraction styrene) - 0.0165) x 2,000 x (1 - (0.45 x VSE factor))

Emission Factor = 88.7 lbs styrene emitted per ton of resin used

Hourly Styrene Emissions = 500 lbs resin/hr x 1 ton/2000 lbs x 88.7 lbs styrene/ton

Hourly Styrene Emissions = 22.2 lbs styrene/hr

The average maximum OC emissions from the use of mold release is 1.7 lbs/hr.

The maximum OC emissions from the use of cleanup materials is 4.0 lbs/hr.

Hourly OC emissions = 22.2 lbs OC/hr + 1.7 lbs OC/hr + 4.0 lbs OC/hr

Hourly OC emissions = 27.9 lbs OC/hr

Therefore, no additional requirements are necessary to show compliance with this limit.

1.d Emission Limitation:

The styrene emissions from this emissions unit shall not exceed 16.6 tons/yr.

Applicable Compliance Method:

The combined styrene emissions limit for emissions units P005 and P006 is 16.6 tons/yr. Therefore, the styrene emissions from this emissions unit cannot exceed 16.6 tons/yr.

V. Testing Requirements (continued)

1.e Emission Limitation:

The VOC emissions from this emissions unit shall not exceed 19.11 tons/yr.

Applicable Compliance Method:

The combined VOC/styrene emissions limit for emissions units P005 and P006 without mold release is 16.6 tons/yr. Therefore, the VOC emissions from this emissions unit without mold release cannot exceed 16.6 tons/yr.

The facility-wide VOC emissions limit from the use of mold release is 2.5 tons/yr.

Annual VOC emissions = 16.6 ton VOC/yr + 2.5 tons VOC/yr

Annual VOC emissions = 19.1 tons VOC/yr

Therefore, no additional requirements are necessary to show compliance with this limit.

1.f Emission Limitation:

The OC emissions from this emissions unit shall not exceed 25.11 tons/yr.

Applicable Compliance Method:

The combined OC emissions limit for emissions units P005 and P006 without mold release is 16.6 tons/yr. Therefore, the OC emissions from this emissions unit without mold release cannot exceed 16.6 tons/yr.

The facility-wide OC emissions limit from the use of mold release is 2.5 tons/yr.

The facility-wide OC emissions limit from the use of cleanup material is 6 tons/yr.

Annual OC emissions = 16.6 ton OC/yr + 2.5 tons OC/yr + 6 tons/yr

Annual OC emissions = 25.1 tons OC/yr

Therefore, no additional requirements are necessary to show compliance with this limit.

1.g Emission Limitation:

The combined styrene emissions from emissions units P005 and P006 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage.

Applicable Compliance Method:

Annual Styrene Emissions = 375.2 tons/yr x 88.7 lbs/ton x 1 ton/2000 lbs

Annual Styrene Emissions = 16.6 tons/yr

Compliance shall be demonstrated by monitoring and record keeping of resin usage found in section A.III.2.

V. Testing Requirements (continued)

1.h Emission Limitation:

The combined VOC emissions from emissions units P005 and P006 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of resin usage. (This limit does not include VOC emissions generated by the use of mold release.)

Applicable Compliance Method:

Annual Styrene Emissions = 375.2 tons/yr x 88.7 lbs/ton x 1 ton/2000 lbs

Annual Styrene Emissions = 16.6 tons/yr

Annual VOC Emissions = 16.6 tons/yr

Compliance shall be demonstrated by monitoring and record keeping found in section A.III.2.

1.i Emission Limitation:

The combined OC emissions from emissions units P005 and P006 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage. (This limit does not include OC emissions generated by the use of mold release and cleanup material.)

Applicable Compliance Method:

Annual OC Emissions = 375.2 tons/yr x 88.7 lbs/ton x 1 ton/2000 lbs

Annual OC Emissions = 16.6 tons/yr

Compliance shall be demonstrated by monitoring and record keeping of resin usage found in section A.III.2.

1.j Emission Limitation:

The combined VOC emissions from the use of mold release from this entire facility shall not exceed 2.5 tons/yr based upon a rolling, 12-month summation of the VOC emissions.

Applicable Compliance Method:

Compliance shall be demonstrated by monitoring and record keeping found in section A.III.4.

1.k Emission Limitation:

The combined OC emissions from the use of mold release and cleanup material from this entire facility shall not exceed 8.5 tons/yr based upon a rolling, 12-month summation of the OC emissions.

Applicable Compliance Method:

Compliance shall be demonstrated by monitoring and record keeping found in sections A.III.3 and A.III.4.

V. Testing Requirements (continued)

1.l Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with the method and procedures specified in OAC rule 3745-17-03(B)(1).

1.m Emission Limitation:

Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with the method and procedures specified in OAC rule 3745-17-03(B)(3).

1.n Emission Limitation:

Particulate emissions shall not exceed 2.1 lbs/hr.

Applicable Compliance Method:

If required, compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

2. Compliance with the operational restrictions in section A.II of these terms and conditions shall be determined in accordance with the following methods:

2.a Operational Restriction:

The maximum amount of combined resin usage for emissions units P005 and P006 shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of resin usage as specified in section A.III.2.

2.b Operational Restriction:

The maximum styrene monomer weight percent, as applied, for the resins employed in this emissions unit shall not exceed forty-four percent (44%).

Applicable Compliance Method:

The percent styrene monomer content shall be determined in accordance with 40 CFR 63.5797. Compliance shall be achieved based on the monitoring and record keeping of resin usage as specified in section A.III.1.

V. Testing Requirements (continued)

2.c Operational Restriction:

The only cleanup material the permittee shall employ in this facility shall be acetone, which has a density of 6.6 lbs OC/gallon, as applied.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of acetone usage as specified in section A.III.1.

2.d Operational Restriction:

The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping specified in section A.III.5.

2.e Operational Restriction:

When emissions unit P005 is being operated, no more than two of the following emissions units may be operated concurrently: P004, P006, P007, and P008.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of emissions units' operating schedules as specified in section A.III.6.

2.f Operational Restriction:

The permittee shall utilize Non-atomized Application Equipment in this emissions unit. Non-atomized Application Equipment means the following:

i. flow coat nozzles for gel coat application equipment;

ii. flow coat nozzle and chopper chute for resin and glass application equipment; and

iii. pressure fed roller equipment.

(For further details, see the CFA's "Controlled Spray Handbook dated 09/98".)

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of the use of Non-atomized Application Equipment as specified in section A.III.1.c.

2.g Operational Restriction:

The permittee shall only employ vapor suppressant resins.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of resin usage as specified in section A.III.1.d.

V. Testing Requirements (continued)

3. The permittee shall determine or have determined the vapor suppressant effectiveness (VSE) factor of the resin(s) utilized in this emissions unit using the "Vapor Supressant Effectiveness Test Protocol" in Appendix A of 40 CFR Part 63, Subpart WWWW within 180 days of the issuance of this permit.

A comprehensive written report on the results of VSE factor determination(s) shall be signed by the persons responsible for the determination(s) and shall be submitted to the Director and to the Canton City Health Department, Air Pollution Control Division within 30 days following completion of the determination(s). The written report shall include the completed Table 17.1, worksheet 17.2 and worksheet 17.3 of the protocol and revised calculations of the calculations shown in terms and conditions A.V.1.a, A.V.1.b, and A.V.1.c using the newly determined VSE Factor.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Spray lay-up station No. 1: mechanical, non-atomized spraying of fiberglass and vapor suppressed resin onto molds in the North building using one spray lay-up gun to produce reinforced plastic composites utilizing fiberglass, vapor suppressed resin, MEKP as catalyst, mold release, and acetone as clean-up solvent with dry filtration system to control particulate emissions.		See section B.III.1.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for these five emissions units (P004, P005, P006, P007, and P008) for the emissions of styrene was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. Using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for "worst case" pollutant:

Pollutant: styrene

TLV (ug/m3): 85,200

Maximum Hourly Emission Rate from P004, P005, P006, P007, and P008 (lbs/hr): 81.66 lbs/hour

Predicted 1-Hour Maximum Ground-Level
Concentration at the Fenceline (ug/m3): 1,792

MAGLC (ug/m3): 2,028 (85,200 ug/m3 divided by 42)

III. Monitoring and/or Record Keeping Requirements (continued)

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials) or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV previously modeled;

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

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

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the changes(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (V)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Spray Lay-up Station #2 (P006)

Activity Description: Spraying of fiberglass and vapor suppressed resin onto molds (1 gun) in North building.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Spray lay-up station No. 2: mechanical, non-atomized spraying of fiberglass and vapor suppressed resin onto molds in the North building using one spray lay-up gun to produce reinforced plastic composites utilizing fiberglass, vapor suppressed resin, MEKP as catalyst, mold release, and acetone as clean-up solvent with dry filtration system to control particulate emissions.	OAC rule 3745-31-05(A)(3) (PTI 15-01457 issued 1/7/2003)	Styrene emissions from this emissions unit shall not exceed 22.2 lbs/hr. (This hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.) Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 23.9 lbs/hr. (This hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.) Organic compound (OC) emissions from this emissions unit shall not exceed 27.9 lbs/hr. (This hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.) Styrene emissions from this emissions unit shall not exceed 16.6 tons/yr.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
		VOC emissions from this emissions unit shall not exceed 19.11 tons/yr. OC emissions from this emissions unit shall not exceed 25.11 tons/yr. The combined styrene emissions from emissions units P005 and P006 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage. The combined VOC emissions from emissions units P005 and P006 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage. (This limit does not include VOC emissions generated by the use of mold release.)

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
		The combined OC emissions from emissions units P005 and P006 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage. (This limit does include OC emissions from cleanup material and mold release usage.) The combined VOC emissions from the use of mold release from this entire facility shall not exceed 2.5 tons/yr based upon a rolling, 12-month summation of the VOC emissions. The combined OC emissions from the use of mold release and cleanup material from this entire facility shall not exceed 8.5 tons/yr based upon a rolling, 12-month summation of the OC emissions. Compliance with this rule also includes compliance with OAC rules 3745-17-07(A), 3745-17-07(B), 3745-17-08(B), and 3745-17-11(B). See sections A.II.1 through A.II.9.
	OAC rule 3745-15-07	See Part I, section B.7.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)(1)	Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	See section A.I.2.a.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 2.1 lbs/hr.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-21-07(G)(9)(g)	In accordance with OAC rule 3745-21-07(G)(9)(g), Best Available Technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).
	40 CFR Part 63, Subpart WWWW Reinforced Plastic Composites Production	See section A.I.2.b. See the Specific Facility Terms and Conditions - Part II sections A.3 through A.29 and Attachment 1.

2. Additional Terms and Conditions

2.a The reasonably available control measure(s) required by this rule shall include a dry filtration system with a collection efficiency that is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

2.b The NESHAP was promulgated on April 21, 2003 and the facility shall be subject to the rule as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the subpart, the permittee shall submit the following notifications:

i. Within 120 days after promulgation of 40 CFR Part 63, Subpart WWWW, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report, in accordance with 40 CFR Part 63.9(b)(2):

(a) the name and mailing address of the permittee;

(b) the physical location of the source if it is different from the mailing address;

(c) identification of the relevant MACT standard and the source's compliance date;

(d) a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each HAP; and

(e) a statement confirming the facility is a major source for HAPs.

2. Additional Terms and Conditions (continued)

ii. Unless otherwise specified in the relevant Subpart, within 60 days following completion of any required compliance demonstration activity specified in the relevant Subpart, the permittee shall submit a notification of compliance status that contains the following information:

(a) the methods used to determine compliance;

(b) the results of any performance tests, visible emission observations, continuous monitoring systems performance evaluations, and/or other monitoring procedures or methods that were conducted;

(c) the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

(d) the type and quantity of HAPs emitted by the source, reported in units and averaging times in accordance with the test methods specified in the relevant Subpart;

(e) an analysis demonstrating whether the affected source is a major source or an area source;

(f) a description of the air pollution control equipment or method for each emission point, including each control device or method for each HAP and the control efficiency (percent) for each control device or method; and

(g) a statement of whether or not the permittee has complied with the requirements of the relevant Subpart.

II. Operational Restrictions

1. The maximum styrene monomer weight percent, as applied, for each resin employed in this emissions unit shall not exceed forty-four percent (44%).

2. The maximum annual combined resin usage for emissions units P005 and P006 shall not exceed 375.2 tons per year based upon a rolling, 12-month summation of the resin usage rates.

To ensure enforceability during the 12 calendar months following the issuance of PTI 15-01457 which was issued on 01/07/03, the permittee shall not exceed the resin usage rate specified in the following table:

Maximum Allowable Cumulative Tons of Resin Usage:

Month(s).....	Ton(s)
1	31.3
1-2	62.5
1-3	93.8
1-4	125.1
1-5	156.3
1-6	187.6
1-7	218.9
1-8	250.1
1-9	281.4
1-10	312.7
1-11	343.9
1-12	375.2

After the first 12 calendar months following issuance of PTI 15-01457 which was issued on 01/07/03, compliance with the annual resin usage for emissions usage for emissions units P005 and P006 shall be based upon a rolling, 12-month summation of the tons of resin used.

II. Operational Restrictions (continued)

3. The only cleanup material the permittee shall employ in this facility shall be acetone, which has a density of 6.6 lbs OC/gallon, as applied.

4. The combined OC emissions from the use of mold release and cleanup material from this entire facility shall not exceed 8.5 tons/yr. based upon the rolling, 12-month summation of the OC emissions.

To ensure enforceability during the 12 calendar months following the issuance of PTI 15-01457 which was issued on 01/07/03, the permittee shall not exceed the OC emission rates from the use of cleanup material and mold release specified in the following table:

Maximum Allowable Cumulative OC Emission Rates from Cleanup Material & Mold Release Usage:

Month(s)	(tons)
1	0.71
1-2	1.42
1-3	2.13
1-4	2.84
1-5	3.55
1-6	4.25
1-7	4.96
1-8	5.67
1-9	6.38
1-10	7.09
1-11	7.80
1-12	8.50

After the first 12 calendar months following issuance of PTI 15-01457 which was issued on 01/07/03, compliance with the annual OC emission rates from the use of cleanup solvent and mold release for the entire facility shall be based upon a rolling, 12-month summation of the tons of OC emissions from the use of cleanup solvent and mold release.

II. Operational Restrictions (continued)

5. The combined VOC emissions from the use of mold release from this entire facility shall not exceed 2.5 tons/yr based upon the rolling, 12-month summation of the VOC emissions.

To ensure enforceability during the 12 calendar months following the issuance of PTI 15-01457 which was issued on 01/07/03, the permittee shall not exceed the VOC emission rates from the use of mold release specified in the following table:

Maximum Allowable Cumulative VOC Emission Rates from Cleanup Material & Mold Release Usage:

Month(s).....	Ton(s)
1	0.20
1-2	0.41
1-3	0.62
1-4	0.83
1-5	1.04
1-6	1.25
1-7	1.46
1-8	1.67
1-9	1.88
1-10	2.09
1-11	2.30
1-12	2.50

After the first 12 calendar months following issuance of PTI 15-01457 which was issued on 01/07/03, compliance with the annual VOC emission rates from mold release usage for this entire facility shall be based upon a rolling, 12-month summation of the tons of VOC emissions from mold release usage.

6. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

7. When emissions unit P006 is being operated, no more than two of the following emissions units may be operated concurrently: P004, P005, P007, and P008.

8. The permittee shall utilize Non-atomized Application Equipment in this emissions unit. Non-atomized Application Equipment means the following:

a. flow coat nozzles for gel coat application equipment;

b. flow coat nozzle and chopper chute for resin and glass application equipment; and

c. pressure fed roller equipment.

(For further details, see the CFA's "Controlled Spray Handbook dated 9/98".)

9. The permittee shall only employ vapor suppressant resins.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of the following information for this emissions unit:

a. the name and identification of each resin and cleanup material employed;

b. the weight fraction of styrene monomer (in percent) for each resin, as applied;

c. documentation that Non-atomized Application Equipment was employed; and

d. documentation that each resin employed was a vapor suppressant resin.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each month for emissions units P005 and P006 as a group:

a. the combined resin usage rate;

b. beginning after the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, the rolling, 12-month summation of the combined resin usage; and

c. during the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, the permittee shall record the cumulative combined resin usage rate for each calendar month.

3. The permittee shall collect and record the following information each month for the entire facility:

a. the company identification for each cleanup material employed;

b. the number of pounds of each cleanup material employed;

c. the OC content of each cleanup material employed, in pounds per gallon;

d. the total OC emission rate for each cleanup material employed, in pounds or tons;

e. the total OC emission rate for all cleanup materials employed, (summation of d), in tons; and

f. the annual, year-to-date OC emission rate for all cleanup materials employed, (summation of "e" for each calendar month to date from January to December), in tons.

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

OC emissions = (total gallons of cleanup material used) x (solvent density of cleanup material) - (total gallons of cleanup material sent off site [minus solids]) x (solvent density of cleanup material).

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall collect and record the following information each month for the entire facility:

a. the company identification for each mold release employed;

b. the number of gallons of each mold release employed;

c. the OC and VOC content of each mold release employed, in pounds per gallon;

d. the total OC and VOC emission rate for each mold release employed, (b x c), in pounds or tons;

e. the total OC and VOC emission rate for all mold release employed, (summation of d), in tons;

f. beginning after the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, the rolling, 12-month summation of the OC emission rates from cleanup material and mold release usage;

g. during the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, the permittee shall record the cumulative OC emission rates from cleanup material and mold release usage for each calendar month;

h. beginning after the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, the rolling, 12-month summation of the VOC emission rates from mold release usage; and

i. during the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, the permittee shall record the cumulative VOC emission rates from mold release usage rate for each calendar month.

5. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

6. Records shall be maintained when more than two of the following emission units are being operated with P006 concurrently: P004, P005, P007, P008.

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

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

*With the use of the dry filtration system, the particulate emissions from this emissions unit should be very minor; therefore, monthly visible emission checks should be sufficient to ensure ongoing compliance with the particulate emission limitations.

III. Monitoring and/or Record Keeping Requirements (continued)

8. The permittee shall perform monthly* checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions of fugitive dust from the building enclosing this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the location where the fugitive dust is escaping the building;
e. the total duration of any visible emission incident; and
f. any corrective actions taken to eliminate the visible emissions.

*With the use of the dry filtration system, the particulate emissions from this emissions unit should be very minor; therefore, monthly visible emission checks should be sufficient to ensure ongoing compliance with the particulate emission limitations.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the number of pounds of each cleanup material employed that was not acetone.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the number of pounds of noncomplying resin (i.e., for weight fraction of styrene monomer) employed.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month resin combined usage limitation of 375.2 tons/yr for emissions units P005 and P006, and, for the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, all exceedances of the maximum allowable cumulative combined resin usage.

4. The permittee shall notify the Canton local air agency in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days after the event occurs.

5. The permittee shall submit quarterly deviation (excursion) reports that identify any times when emissions unit P006 was operating and more than two of the following emissions units were also operating concurrently: P004, P005, P007, and P008.

6. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month facility-wide VOC emissions limitation of 2.5 tons/yr from the usage of mold release and, for the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, all exceedances of the maximum allowable cumulative facility-wide VOC emissions limitation from the use of mold release.

7. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month facility-wide OC emissions limitation of 8.5 tons/yr from the usage of mold release and cleanup material and, for the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, all exceedances of the maximum allowable cumulative facility-wide OC emissions limitation from the use of mold release and cleanup material.

8. The permittee shall submit quarterly deviation (excursion) reports that identify any use of spray equipment by this emissions unit that did not meet the definition of Non-atomized Application Equipment found in section A.II.8.

9. The permittee shall submit quarterly deviation (excursion) reports that identify any use of resins that did not meet the definition of vapor suppressant resin.

10. Except as otherwise specified, the above reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1)(c).

IV. Reporting Requirements (continued)

11. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Canton local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

12. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions of fugitive dust were observed escaping from the building enclosing this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Canton local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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:

Styrene emissions from this emissions unit shall not exceed 22.2 lbs/hr. (This hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.)

Applicable Compliance Method:

The hourly emissions limitation represents the potential to emit for this emissions unit, i.e., the maximum usage rate of 500 lbs of resin/hr and the maximum monomer weight percent allowed under the restrictions of this permit (44%).

The emission factor shall be calculated using Table 1 of the subpart for mechanical non-atomized resin application using a vapor-suppressed resin with VSE factor of 0.3475 and with maximum monomer weight percent of 44%.

Emission Factor = ((0.157 x mass fraction styrene) - 0.0165) x 2,000 x (1 - (0.45 x VSE factor))

Emission Factor = 88.7 lbs styrene emitted per ton of resin used

Hourly Styrene Emissions = 500 lbs resin/hr x 1 ton/2000 lbs x 88.7 lbs styrene/ton

Hourly Styrene Emissions = 22.2 lbs styrene/hr

Therefore, no additional requirements are necessary to show compliance with this limit.

Note that after the VSE factor has been redetermined as provided by this permit, the redetermined value shall be used in this compliance calculation.

V. Testing Requirements (continued)

1.b Emission Limitation:

VOC emissions from this emissions unit shall not exceed 23.9 lbs/hr. (The hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.)

Applicable Compliance Method:

The hourly emissions limitation represents the potential to emit for this emissions unit, i.e., the maximum usage rate of 500 lbs of resin/hr and the maximum monomer weight percent allowed under the restrictions of this permit (44%).

The emission factor shall be calculated using Table 1 of the subpart for non-atomized mechanical resin application using a vapor-suppressed resin with VSE factor of 0.3475 and with maximum monomer weight percent of 44%.

Emission Factor = ((0.157 x mass fraction styrene) - 0.0165) x 2,000 x (1 - (0.45 x VSE factor))

Emission Factor = 88.7 lbs styrene emitted per ton of resin used

Hourly VOC Emissions = 500 lbs resin/hr x 1 ton/2000 lbs x 88.7 lbs styrene/ton

Hourly VOC Emissions = 22.2 lbs styrene/hr

The average maximum VOC emissions from the use of mold release is 1.7 lb/hr.

Hourly VOC emissions = 22.2 lbs VOC/hr + 1.7 lbs VOC/hr

Hourly VOC emissions = 23.9 lbs VOC/hr

Therefore, no additional requirements are necessary to show compliance with this limit.

V. Testing Requirements (continued)

1.c Emission Limitation:

OC emissions from this emissions unit shall not exceed 27.9 lbs/hr. (This hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.)

Applicable Compliance Method:

The hourly emissions limitation represents the potential to emit for this emissions unit, i.e., the maximum usage rate of 500 lbs of resin/hr and the maximum monomer weight percent allowed under the restrictions of this permit (44%).

The emission factor shall be calculated using Table 1 of the subpart for non-atomized mechanical resin application using a vapor-suppressed resin with VSE factor of 0.3475 and with maximum monomer weight percent of 44%.

Emission Factor = ((0.157 x mass fraction styrene) - 0.0165) x 2,000 x (1 - (0.45 x VSE factor))

Emission Factor = 88.7 lbs styrene emitted per ton of resin used

Hourly Styrene Emissions = 500 lbs resin/hr x 1 ton/2000 lbs x 88.7 lbs styrene/ton

Hourly Styrene Emissions = 22.2 lbs styrene/hr

The average maximum OC emissions from the use of mold release is 1.7 lbs/hr.

The maximum OC emissions from the use of cleanup materials is 4.0 lbs/hr.

Hourly OC emissions = 22.2 lbs OC/hr + 1.7 lbs OC/hr + 4.0 lbs OC/hr

Hourly OC emissions = 27.9 lbs OC/hr

Therefore, no additional requirements are necessary to show compliance with this limit.

1.d Emission Limitation:

The styrene emissions from this emissions unit shall not exceed 16.6 tons/yr.

Applicable Compliance Method:

The combined styrene emissions limit for emissions units P005 and P006 is 16.6 tons/yr. Therefore, the styrene emissions from this emissions unit cannot exceed 16.6 tons/yr.

V. Testing Requirements (continued)

1.e Emission Limitation:

The VOC emissions from this emissions unit shall not exceed 19.11 tons/yr.

Applicable Compliance Method:

The combined VOC/styrene emissions limit for emissions units P005 and P006 without mold release is 16.6 tons/yr. Therefore, the VOC emissions from this emissions unit without mold release cannot exceed 16.6 tons/yr.

The facility-wide VOC emissions limit from the use of mold release is 2.5 tons/yr.

Annual VOC emissions = 16.6 tons VOC/yr + 2.5 tons VOC/yr

Annual VOC emissions = 19.1 tons VOC/yr

Therefore, no additional requirements are necessary to show compliance with this limit.

1.f Emission Limitation:

The OC emissions from this emissions unit shall not exceed 25.11 tons/yr.

Applicable Compliance Method:

The combined OC emissions limit for emissions units P005 and P006 without mold release is 16.6 tons/yr. Therefore, the OC emissions from this emissions unit without mold release cannot exceed 16.6 tons/yr.

The facility-wide OC emissions limit from the use of mold release is 2.5 tons/yr.

The facility-wide OC emissions limit from the use of cleanup material is 6 tons/yr.

Annual OC emissions = 16.6 tons OC/yr + 2.5 tons OC/yr + 6 tons/yr

Annual OC emissions = 25.1 tons OC/yr

Therefore, no additional requirements are necessary to show compliance with this limit.

1.g Emission Limitation:

The combined styrene emissions from emissions units P005 and P006 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage.

Applicable Compliance Method:

Annual Styrene Emissions = 375.2 tons/yr x 88.7 lbs/ton x 1 ton/2000 lbs

Annual Styrene Emissions = 16.6 tons/yr

Compliance shall be demonstrated by monitoring and record keeping of resin usage found in section A.III.2.

V. Testing Requirements (continued)

1.h Emission Limitation:

The combined VOC emissions from emissions units P005 and P006 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of resin usage. (This limit does not include VOC emissions generated by the use of mold release.)

Applicable Compliance Method:

Annual Styrene Emissions = 375.2 tons/yr x 88.7 lbs/ton x 1 ton/2000 lbs

Annual Styrene Emissions = 16.6 tons/yr

Annual VOC Emissions = 16.6 tons/yr

Compliance shall be demonstrated by monitoring and record keeping found in section A.III.2.

1.i Emission Limitation:

The combined OC emissions from emissions units P005 and P006 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage. (This limit does not include OC emissions generated by the use of mold release and cleanup material.)

Applicable Compliance Method:

Annual OC Emissions = 375.2 tons/yr x 88.7 lbs/ton x 1 ton/2000 lbs

Annual OC Emissions = 16.6 tons/yr

Compliance shall be demonstrated by monitoring and record keeping of resin usage found in section A.III.2.

1.j Emission Limitation:

The combined VOC emissions from the use of mold release from this entire facility shall not exceed 2.5 tons/yr based upon a rolling, 12-month summation of the VOC emissions.

Applicable Compliance Method:

Compliance shall be demonstrated by monitoring and record keeping found in section A.III.4.

1.k Emission Limitation:

The combined OC emissions from the use of mold release and cleanup material from this entire facility shall not exceed 8.5 tons/yr based upon a rolling, 12-month summation of the OC emissions.

Applicable Compliance Method:

Compliance shall be demonstrated by monitoring and record keeping found in sections A.III.3 and A.III.4.

V. Testing Requirements (continued)

1.l Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with the method and procedures specified in OAC rule 3745-17-03(B)(1).

1.m Emission Limitation:

Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with the method and procedures specified in OAC rule 3745-17-03(B)(3).

1.n Emission Limitation:

Particulate emissions shall not exceed 2.1 lbs/hr.

Applicable Compliance Method:

If required, compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

2. Compliance with the operational restrictions in section A.II of these terms and conditions shall be determined in accordance with the following methods:

2.a Operational Restriction:

The maximum amount of combined resin usage for emissions units P005 and P006 shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of resin usage as specified in section A.III.2.

2.b Operational Restriction:

The maximum styrene monomer weight percent, as applied, for the resins employed in this emissions unit shall not exceed forty-four percent (44%).

Applicable Compliance Method:

The percent styrene monomer content shall be determined in accordance with 40 CFR 63.5797. Compliance shall be achieved based on the monitoring and record keeping of resin usage as specified in section A.III.1.

V. Testing Requirements (continued)

2.c Operational Restriction:

The only cleanup material the permittee shall employ in this facility shall be acetone, which has a density of 6.6 lbs OC/gallon, as applied.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of acetone usage as specified in section A.III.1.

2.d Operational Restriction:

The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping specified in section A.III.5.

2.e Operational Restriction:

When emissions unit P006 is being operated, no more than two of the following emissions units may be operated concurrently: P004, P005, P007, and P008.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of emissions units' operating schedules as specified in section A.III.6.

2.f Operational Restriction:

The permittee shall utilize Non-atomized Application Equipment in this emissions unit. Non-atomized Application Equipment means the following:

i. flow coat nozzles for gel coat application equipment;

ii. flow coat nozzle and chopper chute for resin and glass application equipment; and

iii. pressure fed roller equipment.

(For further details, see the CFA's "Controlled Spray Handbook dated 09/98".)

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of the use of Non-atomized Application Equipment as specified in section A.III.1.c.

2.g Operational Restriction:

The permittee shall only employ vapor suppressant resins.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of resin usage as specified in section A.III.1.d.

V. Testing Requirements (continued)

3. The permittee shall determine or have determined the vapor suppressant effectiveness (VSE) factor of the resin(s) utilized in this emissions unit using the "Vapor Supressant Effectiveness Test Protocol" in Appendix A of 40 CFR Part 63, Subpart WWWW within 180 days of the issuance of this permit.

A comprehensive written report on the results of VSE factor determination(s) shall be signed by the persons responsible for the determination(s) and shall be submitted to the Director and to the Canton City Health Department, Air Pollution Control Division within 30 days following completion of the determination(s). The written report shall include the completed Table 17.1, worksheet 17.2 and worksheet 17.3 of the protocol and revised calculations of the calculations shown in terms and conditions A.V.1.a, A.V.1.b, and A.V.1.c using the newly determined VSE Factor.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Spray lay-up station No. 2: mechanical, non-atomized spraying of fiberglass and vapor suppressed resin onto molds in the North building using one spray lay-up gun to produce reinforced plastic composites utilizing fiberglass, vapor suppressed resin, MEKP as catalyst, mold release, and acetone as clean-up solvent with dry filtration system to control particulate emissions.		See section B.III.1.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for these five emissions units (P004, P005, P006, P007, and P008) for the emissions of styrene was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. Using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for "worst case" pollutant:

Pollutant: styrene

TLV (ug/m3): 85,200

Maximum Hourly Emission Rate from P004, P005, P006, P007, and P008 (lbs/hr): 81.66 lbs/hour

Predicted 1-Hour Maximum Ground-Level
Concentration at the Fenceline (ug/m3): 1,792

MAGLC (ug/m3): 2,028 (85,200 ug/m3 divided by 42)

III. Monitoring and/or Record Keeping Requirements (continued)

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials) or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV previously modeled;

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

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

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the changes(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (V)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Spray Lay-up Station #3 (P007)

Activity Description: Spraying of fiberglass and vapor suppressed resin onto molds (1 gun) in South building.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Spray lay-up station No. 3: mechanical, non-atomized spraying of fiberglass and vapor suppressed resin onto molds in the South building using one spray lay-up gun to produce reinforced plastic composites utilizing fiberglass, vapor suppressed resin, MEKP as catalyst, mold release, and acetone as clean-up solvent with dry filtration system to control particulate emissions.	OAC rule 3745-31-05(A)(3) (PTI 15-01457 issued 1/7/2003)	Styrene emissions from this emissions unit shall not exceed 22.2 lbs/hr. (This hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.) Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 23.9 lbs/hr. (This hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.) Organic compound (OC) emissions from this emissions unit shall not exceed 27.9 lbs/hr. (This hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.) Styrene emissions from this emissions unit shall not exceed 16.6 tons/yr.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
		VOC emissions from this emissions unit shall not exceed 19.11 tons/yr. OC emissions from this emissions unit shall not exceed 25.11 tons/yr. The combined styrene emissions from emissions units P007 and P008 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage. The combined VOC emissions from emissions units P007 and P008 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage. (This limit does not include VOC emissions generated by the use of mold release.)

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
		The combined OC emissions from emissions units P007 and P008 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage. (This limit does include OC emissions from cleanup material and mold release usage.) The combined VOC emissions from the use of mold release from this entire facility shall not exceed 2.5 tons/yr based upon a rolling, 12-month summation of the VOC emissions. The combined OC emissions from the use of mold release and cleanup material from this entire facility shall not exceed 8.5 tons/yr based upon a rolling, 12-month summation of the OC emissions. Compliance with this rule also includes compliance with OAC rules 3745-17-07(A), 3745-17-07(B), 3745-17-08(B), and 3745-17-11(B). See sections A.II.1 through A.II.9.
	OAC rule 3745-15-07	See Part I, section B.7.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)(1)	Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	See section A.I.2.a.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 2.1 lbs/hr.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-21-07(G)(9)(g)	In accordance with OAC rule 3745-21-07(G)(9)(g), Best Available Technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).
	40 CFR Part 63 Subpart, WWWW Reinforced Plastic Composites Production	See section A.I.2.b. See the Specific Facility Terms and Conditions - Part II sections A.3 through A.29 and Attachment 1.

2. Additional Terms and Conditions

2.a The reasonably available control measure(s) required by this rule shall include a dry filtration system with a collection efficiency that is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

2.b The NESHAP was promulgated on April 21, 2003 and the facility shall be subject to the rule as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the subpart, the permittee shall submit the following notifications:

i. Within 120 days after promulgation of 40 CFR Part 63, Subpart WWWW, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report, in accordance with 40 CFR Part 63.9(b)(2):

(a) the name and mailing address of the permittee;

(b) the physical location of the source if it is different from the mailing address;

(c) identification of the relevant MACT standard and the source's compliance date;

(d) a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each HAP; and

(e) a statement confirming the facility is a major source for HAPs.

2. Additional Terms and Conditions (continued)

ii. Unless otherwise specified in the relevant Subpart, within 60 days following completion of any required compliance demonstration activity specified in the relevant Subpart, the permittee shall submit a notification of compliance status that contains the following information:

(a) the methods used to determine compliance;

(b) the results of any performance tests, visible emission observations, continuous monitoring systems performance evaluations, and/or other monitoring procedures or methods that were conducted;

(c) the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

(d) the type and quantity of HAPs emitted by the source, reported in units and averaging times in accordance with the test methods specified in the relevant Subpart;

(e) an analysis demonstrating whether the affected source is a major source or an area source;

(f) a description of the air pollution control equipment or method for each emission point, including each control device or method for each HAP and the control efficiency (percent) for each control device or method; and

(g) a statement of whether or not the permittee has complied with the requirements of the relevant Subpart.

II. Operational Restrictions

1. The maximum styrene monomer weight percent, as applied, for each resin employed in this emissions unit shall not exceed forty-four percent (44%).

2. The maximum annual combined resin usage for emissions units P007 and P008 shall not exceed 375.2 tons per year based upon a rolling, 12-month summation of the resin usage rates.

To ensure enforceability during the 12 calendar months following the issuance of PTI 15-01457 which was issued on 01/07/03, the permittee shall not exceed the resin usage rate specified in the following table:

Maximum Allowable Cumulative Tons of Resin Usage:

Month(s)	Ton(s)
1	31.3
1-2	62.5
1-3	93.8
1-4	125.1
1-5	156.3
1-6	187.6
1-7	218.9
1-8	250.1
1-9	281.4
1-10	312.7
1-11	343.9
1-12	375.2

After the first 12 calendar months following issuance of PTI 15-01457 which was issued on 01/07/03, compliance with the annual resin usage for emissions usage for emissions units P007 and P008 shall be based upon a rolling, 12-month summation of the tons of resin used.

II. Operational Restrictions (continued)

3. The only cleanup material the permittee shall employ in this facility shall be acetone, which has a density of 6.6 lbs OC/gallon, as applied.

4. The combined OC emissions from the use of mold release and cleanup material from this entire facility shall not exceed 8.5 tons/yr based upon the rolling, 12-month summation of the OC emissions.

To ensure enforceability during the 12 calendar months following the issuance of PTI 15-01457 which was issued on 01/07/03, the permittee shall not exceed the OC emission rates from the use of cleanup material and mold release specified in the following table:

Maximum Allowable Cumulative OC Emission Rates from Cleanup Material & Mold Release Usage:

Month(s)	(tons)
1	0.71
1-2	1.42
1-3	2.13
1-4	2.84
1-5	3.55
1-6	4.25
1-7	4.96
1-8	5.67
1-9	6.38
1-10	7.09
1-11	7.80
1-12	8.50

After the first 12 calendar months following issuance of PTI 15-01457 which was issued on 01/07/03, compliance with the annual OC emission rates from the use of cleanup solvent and mold release for the entire facility shall be based upon a rolling, 12-month summation of the tons of OC emissions from the use of cleanup solvent and mold release.

II. Operational Restrictions (continued)

5. The combined VOC emissions from the use of mold release from this entire facility shall not exceed 2.5 tons/yr based upon the rolling, 12-month summation of the VOC emissions.

To ensure enforceability during the 12 calendar months following the issuance of PTI 15-01457 which was issued on 01/07/03, the permittee shall not exceed the VOC emission rates from the use of mold release specified in the following table:

Maximum Allowable Cumulative VOC Emission Rates from Cleanup Material & Mold Release Usage:

Month(s).....	Ton(s)
1	0.20
1-2	0.41
1-3	0.62
1-4	0.83
1-5	1.04
1-6	1.25
1-7	1.46
1-8	1.67
1-9	1.88
1-10	2.09
1-11	2.30
1-12	2.50

After the first 12 calendar months following issuance of PTI 15-01457 which was issued on 01/07/03, compliance with the annual VOC emission rates from the use of mold release from the entire facility shall be based upon a rolling, 12-month summation of the tons of VOC emissions from the use of mold release.

6. The permittee shall operate the dry filtration system to control particulate emissions whenever this emissions unit is in operation.

7. When emissions unit P007 is being operated, no more than two of the following emissions units may be operated concurrently: P004, P005, P006, and P008.

8. The permittee shall utilize Non-atomized Application Equipment in this emissions unit. Non-atomized Application Equipment means the following:

a. flow coat nozzles for gel coat application equipment;

b. flow coat nozzle and chopper chute for resin and glass application equipment; and

c. pressure fed roller equipment.

(For further details, see the CFA's "Controlled Spray Handbook dated 9/98".)

9. The permittee shall only employ vapor suppressant resins.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of the following information for this emissions unit:

a. the name and identification of each resin and cleanup material employed;

b. the weight fraction of styrene monomer (in percent) for each resin, as applied;

c. documentation that Non-atomized Application Equipment was employed; and

d. documentation that each resin employed was a vapor suppressant resin.

2. The permittee shall collect and record the following information each month for emissions units P007 and P008 as a group:

a. the combined resin usage rate;

b. beginning after the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, the rolling, 12-month summation of the combined resin usage; and

c. during the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, the permittee shall record the cumulative combined resin usage rate for each calendar month.

3. The permittee shall collect and record the following information each month for the entire facility:

a. the company identification for each cleanup material employed;

b. the number of pounds of each cleanup material employed;

c. the OC content of each cleanup material employed, in pounds per gallon;

d. the total OC emission rate for each cleanup material employed, in pounds or tons;

e. the total OC emission rate for all cleanup materials employed, (summation of d), in tons; and

f. the annual, year-to-date OC emission rate for all cleanup materials employed, (summation of "e" for each calendar month to date from January to December), in tons.

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

OC emissions = (total gallons of cleanup material used) x (solvent density of cleanup material) - (total gallons of cleanup material sent off site [minus solids]) x (solvent density of cleanup material).

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall collect and record the following information each month for the entire facility:

a. the company identification for each mold release employed;

b. the number of gallons of each mold release employed;

c. the OC and VOC content of each mold release employed, in pounds per gallon;

d. the total OC and VOC emission rate for each mold release employed, (b x c), in pounds or tons;

e. the total OC and VOC emission rate for all mold release employed, (summation of d), in tons;

f. beginning after the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, the rolling, 12-month summation of the OC emission rates from cleanup material and mold release usage;

g. during the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, the permittee shall record the cumulative OC emission rates from cleanup material and mold release usage for each calendar month;

h. beginning after the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, the rolling, 12-month summation of the VOC emission rates from mold release usage; and

i. during the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, the permittee shall record the cumulative VOC emission rates from mold release usage rate for each calendar month.

5. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

6. Records shall be maintained when more than two of the following emission units are being operated with P007 concurrently: P004, P005, P006, P008.

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

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

*With the use of the dry filtration system, the particulate emissions from this emissions unit should be very minor; therefore, monthly visible emission checks should be sufficient to ensure ongoing compliance with the particulate emission limitations.

III. Monitoring and/or Record Keeping Requirements (continued)

8. The permittee shall perform monthly* checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions of fugitive dust from the building enclosing this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the location where the fugitive dust is escaping the building;
e. the total duration of any visible emission incident; and
f. any corrective actions taken to eliminate the visible emissions.

*With the use of the dry filtration system, the particulate emissions from this emissions unit should be very minor; therefore, monthly visible emission checks should be sufficient to ensure ongoing compliance with the particulate emission limitations.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the number of pounds of each cleanup material employed that was not acetone.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the number of pounds of noncomplying resin (i.e., for weight fraction of styrene monomer) employed.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month resin combined usage limitation of 375.2 tons/yr for emissions units P007 and P008, and, for the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, all exceedances of the maximum allowable cumulative combined resin usage.

4. The permittee shall notify the Canton local air agency in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days after the event occurs.

5. The permittee shall submit quarterly deviation (excursion) reports that identify any times when emissions unit P007 was operating and more than two of the following emissions units were also operating concurrently: P004, P005, P006, and P008.

6. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month facility-wide VOC emissions limitation of 2.5 tons/yr from the usage of mold release and, for the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, all exceedances of the maximum allowable cumulative facility-wide VOC emissions limitation from the use of mold release.

7. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month facility-wide OC emissions limitation of 8.5 tons/yr from the usage of mold release and cleanup material and, for the first 12 calendar months of operation following the issuance of PTI 15-01457 which was issued on 01/07/03, all exceedances of the maximum allowable cumulative facility-wide OC emissions limitation from the use of mold release and cleanup material.

8. The permittee shall submit quarterly deviation (excursion) reports that identify any use of spray equipment by this emissions unit that did not meet the definition of Non-atomized Application Equipment found in section A.II.8.

9. The permittee shall submit quarterly deviation (excursion) reports that identify any use of resins that did not meet the definition of vapor suppressant resin.

10. Except as otherwise specified, the above reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1)(c).

IV. Reporting Requirements (continued)

11. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Canton local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

12. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions of fugitive dust were observed escaping from the building enclosing this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Canton local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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:

Styrene emissions from this emissions unit shall not exceed 22.2 lbs/hr. (This hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.)

Applicable Compliance Method:

The hourly emissions limitation represents the potential to emit for this emissions unit, i.e., the maximum usage rate of 500 lbs of resin/hr and the maximum monomer weight percent allowed under the restrictions of this permit (44%).

The emission factor shall be calculated using Table 1 of the subpart for mechanical non-atomized resin application using a vapor-suppressed resin with VSE factor of 0.3475 and with maximum monomer weight percent of 44%.

Emission Factor = ((0.157 x mass fraction styrene) - 0.0165) x 2,000 x (1 - (0.45 x VSE factor))

Emission Factor = 88.7 lbs styrene emitted per ton of resin used

Hourly Styrene Emissions = 500 lbs resin/hr x 1 ton/2000 lbs x 88.7 lbs styrene/ton

Hourly Styrene Emissions = 22.2 lbs styrene/hr

Therefore, no additional requirements are necessary to show compliance with this limit.

Note that after the VSE factor has been redetermined as provided by this permit, the redetermined value shall be used in this compliance calculation.

V. Testing Requirements (continued)

1.b Emission Limitation:

VOC emissions from this emissions unit shall not exceed 23.9 lbs/hr. (The hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.)

Applicable Compliance Method:

The hourly emissions limitation represents the potential to emit for this emissions unit, i.e., the maximum usage rate of 500 lbs of resin/hr and the maximum monomer weight percent allowed under the restrictions of this permit (44%).

The emission factor shall be calculated using Table 1 of the subpart for non-atomized mechanical resin application using a vapor-suppressed resin with VSE factor of 0.3475 and with maximum monomer weight percent of 44%.

Emission Factor = ((0.157 x mass fraction styrene) - 0.0165) x 2,000 x (1 - (0.45 x VSE factor))

Emission Factor = 88.7 lbs styrene emitted per ton of resin used

Hourly VOC Emissions = 500 lbs resin/hr x 1 ton/2000 lbs x 88.7 lbs styrene/ton

Hourly VOC Emissions = 22.2 lbs styrene/hr

The average maximum VOC emissions from the use of mold release is 1.7 lbs/hr.

Hourly VOC emissions = 22.2 lbs VOC/hr + 1.7 lbs VOC/hr

Hourly VOC emissions = 23.9 lbs VOC/hr

Therefore, no additional requirements are necessary to show compliance with this limit.

V. Testing Requirements (continued)

1.c Emission Limitation:

OC emissions from this emissions unit shall not exceed 27.9 lbs/hr. (This hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.)

Applicable Compliance Method:

The hourly emissions limitation represents the potential to emit for this emissions unit, i.e., the maximum usage rate of 500 lbs of resin/hr and the maximum monomer weight percent allowed under the restrictions of this permit (44%).

The emission factor shall be calculated using Table 1 of the subpart for non-atomized mechanical resin application using a vapor-suppressed resin with VSE factor of 0.3475 and with maximum monomer weight percent of 44%.

Emission Factor = ((0.157 x mass fraction styrene) - 0.0165) x 2,000 x (1 - (0.45 x VSE factor))

Emission Factor = 88.7 lbs styrene emitted per ton of resin used

Hourly Styrene Emissions = 500 lbs resin/hr x 1 ton/2000 lbs x 88.7 lbs styrene/ton

Hourly Styrene Emissions = 22.2 lbs styrene/hr

The average maximum OC emissions from the use of mold release is 1.7 lbs/hr.

The maximum OC emissions from the use of cleanup materials is 4.0 lbs/hr.

Hourly OC emissions = 22.2 lbs OC/hr + 1.7 lbs OC/hr + 4.0 lbs OC/hr

Hourly OC emissions = 27.9 lbs OC/hr

Therefore, no additional requirements are necessary to show compliance with this limit.

1.d Emission Limitation:

The styrene emissions from this emissions unit shall not exceed 16.6 tons/yr.

Applicable Compliance Method:

The combined styrene emissions limit for emissions units P007 and P008 is 16.6 tons/yr. Therefore, the styrene emissions from this emissions unit cannot exceed 16.6 tons/yr.

V. Testing Requirements (continued)

1.e Emission Limitation:

The VOC emissions from this emissions unit shall not exceed 19.11 tons/yr.

Applicable Compliance Method:

The combined VOC/styrene emissions limit for emissions units P007 and P008 without mold release is 16.6 tons/yr. Therefore, the VOC emissions from this emissions unit without mold release cannot exceed 16.6 tons/yr.

The facility-wide VOC emissions limit from the use of mold release is 2.5 tons/yr.

Annual VOC emissions = 16.6 tons VOC/yr + 2.5 tons VOC/yr

Annual VOC emissions = 19.1 tons VOC/yr

Therefore, no additional requirements are necessary to show compliance with this limit.

1.f Emission Limitation:

The OC emissions from this emissions unit shall not exceed 25.11 tons/yr.

Applicable Compliance Method:

The combined OC emissions limit for emissions units P007 and P008 without mold release is 16.6 tons/yr. Therefore, the OC emissions from this emissions unit without mold release cannot exceed 16.6 tons/yr.

The facility-wide OC emissions limit from the use of mold release is 2.5 tons/yr.

The facility-wide OC emissions limit from the use of cleanup material is 6 tons/yr.

Annual OC emissions = 16.6 tons OC/yr + 2.5 tons OC/yr + 6 tons/yr

Annual OC emissions = 25.1 tons OC/yr

Therefore, no additional requirements are necessary to show compliance with this limit.

1.g Emission Limitation:

The combined styrene emissions from emissions units P007 and P008 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage.

Applicable Compliance Method:

Annual Styrene Emissions = 375.2 tons/yr x 88.7 lbs/ton x 1 ton/2000 lbs

Annual Styrene Emissions = 16.6 tons/yr

Compliance shall be demonstrated by monitoring and record keeping of resin usage found in section A.III.2.

V. Testing Requirements (continued)

1.h Emission Limitation:

The combined VOC emissions from emissions units P007 and P008 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of resin usage. (This limit does not include VOC emissions generated by the use of mold release.)

Applicable Compliance Method:

Annual Styrene Emissions = 375.2 tons/yr x 88.7 lbs/ton x 1 ton/2000 lbs

Annual Styrene Emissions = 16.6 tons/yr

Annual VOC Emissions = 16.6 tons/yr

Compliance shall be demonstrated by monitoring and record keeping found in section A.III.2.

1.i Emission Limitation:

The combined OC emissions from emissions units P007 and P008 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage. (This limit does not include OC emissions generated by the use of mold release and cleanup material.)

Applicable Compliance Method:

Annual OC Emissions = 375.2 tons/yr x 88.7 lbs/ton x 1 ton/2000 lbs

Annual OC Emissions = 16.6 tons/yr

Compliance shall be demonstrated by monitoring and record keeping of resin usage found in section A.III.2.

1.j Emission Limitation:

The combined VOC emissions from the use of mold release from this entire facility shall not exceed 2.5 tons/yr based upon a rolling, 12-month summation of the VOC emissions.

Applicable Compliance Method:

Compliance shall be demonstrated by monitoring and record keeping found in section A.III.4.

1.k Emission Limitation:

The combined OC emissions from the use of mold release and cleanup material from this entire facility shall not exceed 8.5 tons/yr based upon a rolling, 12-month summation of the OC emissions.

Applicable Compliance Method:

Compliance shall be demonstrated by monitoring and record keeping found in sections A.III.3 and A.III.4.

V. Testing Requirements (continued)

1.l Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with the method and procedures specified in OAC rule 3745-17-03(B)(1).

1.m Emission Limitation:

Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with the method and procedures specified in OAC rule 3745-17-03(B)(3).

1.n Emission Limitation:

Particulate emissions shall not exceed 2.1 lbs/hr.

Applicable Compliance Method:

If required, compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

2. Compliance with the operational restrictions in section A.II of these terms and conditions shall be determined in accordance with the following methods:

2.a Operational Restriction:

The maximum amount of combined resin usage for emissions units P007 and P008 shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of resin usage as specified in section A.III.2.

2.b Operational Restriction:

The maximum styrene monomer weight percent, as applied, for the resins employed in this emissions unit shall not exceed forty-four percent (44%).

Applicable Compliance Method:

The percent styrene monomer content shall be determined in accordance with 40 CFR 63.5797. Compliance shall be achieved based on the monitoring and record keeping of resin usage as specified in section A.III.1.

V. Testing Requirements (continued)

2.c Operational Restriction:

The only cleanup material the permittee shall employ in this facility shall be acetone, which has a density of 6.6 lbs OC/gallon, as applied.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of acetone usage as specified in section A.III.1.

2.d Operational Restriction:

The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping specified in section A.III.5.

2.e Operational Restriction:

When emissions unit P007 is being operated, no more than two of the following emissions units may be operated concurrently: P004, P005, P006, and P008.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of emissions units' operating schedules as specified in section A.III.6.

2.f Operational Restriction:

The permittee shall utilize Non-atomized Application Equipment in this emissions unit. Non-atomized Application Equipment means the following:

i. flow coat nozzles for gel coat application equipment;

ii. flow coat nozzle and chopper chute for resin and glass application equipment; and

iii. pressure fed roller equipment.

(For further details, see the CFA's "Controlled Spray Handbook dated 09/98".)

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of the use of Non-atomized Application Equipment as specified in section A.III.1.c.

2.g Operational Restriction:

The permittee shall only employ vapor suppressant resins.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of resin usage as specified in section A.III.1.d.

V. Testing Requirements (continued)

3. The permittee shall determine or have determined the vapor suppressant effectiveness (VSE) factor of the resin(s) utilized in this emissions unit using the "Vapor Supressant Effectiveness Test Protocol" in Appendix A of 40 CFR Part 63, Subpart WWWW within 180 days of the issuance of this permit.

A comprehensive written report on the results of VSE factor determination(s) shall be signed by the persons responsible for the determination(s) and shall be submitted to the Director and to the Canton City Health Department, Air Pollution Control Division within 30 days following completion of the determination(s). The written report shall include the completed Table 17.1, worksheet 17.2 and worksheet 17.3 of the protocol and revised calculations of the calculations shown in terms and conditions A.V.1.a, A.V.1.b, and A.V.1.c using the newly determined VSE Factor.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Spray lay-up station No. 3: mechanical, non-atomized spraying of fiberglass and vapor suppressed resin onto molds in the South building using one spray lay-up gun to produce reinforced plastic composites utilizing fiberglass, vapor suppressed resin, MEKP as catalyst, mold release, and acetone as clean-up solvent with dry filtration system to control particulate emissions.		See section B.III.1.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for these five emissions units (P004, P005, P006, P007, and P008) for the emissions of styrene was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. Using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for "worst case" pollutant:

Pollutant: styrene

TLV (ug/m3): 85,200

Maximum Hourly Emission Rate from P004, P005, P006, P007, and P008 (lbs/hr): 81.66 lbs/hour

Predicted 1-Hour Maximum Ground-Level
Concentration at the Fenceline (ug/m3): 1,792

MAGLC (ug/m3): 2,028 (85,200 ug/m3 divided by 42)

III. Monitoring and/or Record Keeping Requirements (continued)

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials) or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV previously modeled;

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

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

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the changes(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (V)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Spray Lay-up Station #4 (P008)

Activity Description: Spraying of fiberglass and vapor suppressed resin onto molds (1 gun) in South building.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Spray lay-up station No. 4: mechanical, non-atomized spraying of fiberglass and vapor suppressed resin onto molds in the South building using one spray lay-up gun to produce reinforced plastic composites utilizing fiberglass, vapor suppressed resin, MEKP as catalyst, mold release, and acetone as clean-up solvent with dry filtration system to control particulate emissions.	OAC rule 3745-31-05(A)(3) (PTI 15-01457 issued 1/7/2003)	Styrene emissions from this emissions unit shall not exceed 22.2 lbs/hr. (This hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.) Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 23.9 lbs/hr. (This hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.) Organic compound (OC) emissions from this emissions unit shall not exceed 27.9 lbs/hr. (This hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.) Styrene emissions from this emissions unit shall not exceed 16.6 tons/yr.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
		VOC emissions from this emissions unit shall not exceed 19.11 tons/yr. OC emissions from this emissions unit shall not exceed 25.11 tons/yr. The combined styrene emissions from emissions units P007 and P008 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage. The combined VOC emissions from emissions units P007 and P008 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage. (This limit does not include VOC emissions generated by the use of mold release.)

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
		The combined OC emissions from emissions units P007 and P008 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage. (This limit does include OC emissions from cleanup material and mold release usage.) The combined VOC emissions from the use of mold release from this entire facility shall not exceed 2.5 tons/yr based upon a rolling, 12-month summation of the VOC emissions. The combined OC emissions from the use of mold release and cleanup material from this entire facility shall not exceed 8.5 tons/yr based upon a rolling, 12-month summation of the OC emissions. Compliance with this rule also includes compliance with OAC rules 3745-17-07(A), 3745-17-07(B), 3745-17-08(B), and 3745-17-11(B). See sections A.II.1 through A.II.9.
	OAC rule 3745-15-07	See Part I, section B.7.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)(1)	Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	See section A.I.2.a.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 2.1 lbs/hr.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-21-07(G)(9)(g)	In accordance with OAC rule 3745-21-07(G)(9)(g), Best Available Technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).
	40 CFR Part 63, Subpart WWWW Reinforced Plastic Composites Production	See section A.I.2.b. See the Specific Facility Terms and Conditions - Part II sections A.3 through A.29 and Attachment 1.

2. Additional Terms and Conditions

2.a The reasonably available control measure(s) required by this rule shall include a dry filtration system with a collection efficiency that is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

2.b The NESHAP was promulgated on April 21, 2003 and the facility shall be subject to the rule as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the subpart, the permittee shall submit the following notifications:

i. Within 120 days after promulgation of 40 CFR Part 63, Subpart WWWW, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report, in accordance with 40 CFR Part 63.9(b)(2):

(a) the name and mailing address of the permittee;

(b) the physical location of the source if it is different from the mailing address;

(c) identification of the relevant MACT standard and the source's compliance date;

(d) a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each HAP; and

(e) a statement confirming the facility is a major source for HAPs.

2. Additional Terms and Conditions (continued)

ii. Unless otherwise specified in the relevant Subpart, within 60 days following completion of any required compliance demonstration activity specified in the relevant Subpart, the permittee shall submit a notification of compliance status that contains the following information:

(a) the methods used to determine compliance;

(b) the results of any performance tests, visible emission observations, continuous monitoring systems performance evaluations, and/or other monitoring procedures or methods that were conducted;

(c) the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

(d) the type and quantity of HAPs emitted by the source, reported in units and averaging times in accordance with the test methods specified in the relevant Subpart;

(e) an analysis demonstrating whether the affected source is a major source or an area source;

(f) a description of the air pollution control equipment or method for each emission point, including each control device or method for each HAP and the control efficiency (percent) for each control device or method; and

(g) a statement of whether or not the permittee has complied with the requirements of the relevant Subpart.

II. Operational Restrictions

1. The maximum styrene monomer weight percent, as applied, for each resin employed in this emissions unit shall not exceed forty-four percent (44%).

2. The maximum annual combined resin usage for emissions units P007 and P008 shall not exceed 375.2 tons per year based upon a rolling, 12-month summation of the resin usage rates.

To ensure enforceability during the 12 calendar months following the issuance of PTI #15-01457which was issued 01/07/03, the permittee shall not exceed the resin usage rate specified in the following table:

Maximum Allowable Cumulative Tons of Resin Usage:

Month(s).....	Ton(s)
1	31.3
1-2	62.5
1-3	93.8
1-4	125.1
1-5	156.3
1-6	187.6
1-7	218.9
1-8	250.1
1-9	281.4
1-10	312.7
1-11	343.9
1-12	375.2

After the first 12 calendar months following issuance of PTI #15-01457 which was issued 01/07/03, compliance with the annual resin usage for emissions usage for emissions units P007 and P008 shall be based upon a rolling, 12-month summation of the tons of resin used.

II. Operational Restrictions (continued)

3. The only cleanup material the permittee shall employ in this facility shall be acetone, which has a density of 6.6 lbs OC/gallon, as applied.

4. The combined OC emissions from the use of mold release and cleanup material from this entire facility shall not exceed 8.5 tons/yr. based upon the rolling, 12-month summation of the OC emissions.

To ensure enforceability during the 12 calendar months following the issuance of PTI #15-01457 which was issued 01/07/03, the permittee shall not exceed the OC emission rates from the use of cleanup material and mold release specified in the following table:

Maximum Allowable Cumulative OC Emission Rates from Cleanup Material & Mold Release Usage:

Month(s)	(tons)
1	0.71
1-2	1.42
1-3	2.13
1-4	2.84
1-5	3.55
1-6	4.25
1-7	4.96
1-8	5.67
1-9	6.38
1-10	7.09
1-11	7.80
1-12	8.50

After the first 12 calendar months following issuance of PTI #15-01457 which was issued 01/07/03, compliance with the annual OC emission rates from the use of cleanup solvent and mold release for the entire facility shall be based upon a rolling, 12-month summation of the tons of OC emissions from the use of cleanup solvent and mold release.

II. Operational Restrictions (continued)

5. The combined VOC emissions from the use of mold release from this entire facility shall not exceed 2.5 tons/yr based upon the rolling, 12-month summation of the VOC emissions.

To ensure enforceability during the 12 calendar months following the issuance of PTI #15-01457 which was issued 01/07/03, the permittee shall not exceed the VOC emission rates from the use of mold release specified in the following table:

Maximum Allowable Cumulative VOC Emission Rates from Cleanup Material & Mold Release Usage:

Month(s).....	Ton(s)
1	0.20
1-2	0.41
1-3	0.62
1-4	0.83
1-5	1.04
1-6	1.25
1-7	1.46
1-8	1.67
1-9	1.88
1-10	2.09
1-11	2.30
1-12	2.50

After the first 12 calendar months following issuance of PTI #15-01457 which was issued 01/07/03, compliance with the annual VOC emission rates from the use of mold release from the entire facility shall be based upon a rolling, 12-month summation of the tons of VOC emissions from the use of mold release.

6. The permittee shall operate the dry filtration system to control particulate emissions whenever this emissions unit is in operation.

7. When emissions unit P008 is being operated, no more than two of the following emissions units may be operated concurrently: P004, P005, P006, and P007.

8. The permittee shall utilize Non-atomized Application Equipment in this emissions unit. Non-atomized Application Equipment means the following:

a. flow coat nozzles for gel coat application equipment;

b. flow coat nozzle and chopper chute for resin and glass application equipment; and

c. pressure fed roller equipment.

(For further details, see the CFA's "Controlled Spray Handbook dated 9/98".)

9. The permittee shall only employ vapor suppressant resins.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of the following information for this emissions unit:

a. the name and identification of each resin and cleanup material employed;

b. the weight fraction of styrene monomer (in percent) for each resin, as applied;

c. documentation that Non-atomized Application Equipment was employed; and

d. documentation that each resin employed was a vapor suppressant resin.

2. The permittee shall collect and record the following information each month for emissions units P007 and P008 as a group:

a. the combined resin usage rate;

b. beginning after the first 12 calendar months of operation following the issuance of PTI #15-01457 which was issued 01/07/03, the rolling, 12-month summation of the combined resin usage; and

c. during the first 12 calendar months of operation following the issuance of PTI #15-01457 which was issued 01/07/03, the permittee shall record the cumulative combined resin usage rate for each calendar month.

3. The permittee shall collect and record the following information each month for the entire facility:

a. the company identification for each cleanup material employed;

b. the number of pounds of each cleanup material employed;

c. the OC content of each cleanup material employed, in pounds per gallon;

d. the total OC emission rate for each cleanup material employed, in pounds or tons;

e. the total OC emission rate for all cleanup materials employed, (summation of d), in tons; and

f. the annual, year-to-date OC emission rate for all cleanup materials employed, (summation of "e" for each calendar month to date from January to December), in tons.

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

OC emissions = (total gallons of cleanup material used) x (solvent density of cleanup material) - (total gallons of cleanup material sent off site [minus solids]) x (solvent density of cleanup material).

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall collect and record the following information each month for the entire facility:

a. the company identification for each mold release employed;

b. the number of gallons of each mold release employed;

c. the OC and VOC content of each mold release employed, in pounds per gallon;

d. the total OC and VOC emission rate for each mold release employed, (b x c), in pounds or tons;

e. the total OC and VOC emission rate for all mold release employed, (summation of d), in tons;

f. beginning after the first 12 calendar months of operation following the issuance of PTI #15-01457 which was issued 01/07/03, the rolling, 12-month summation of the OC emission rates from cleanup material and mold release usage;

g. during the first 12 calendar months of operation following the issuance of PTI #15-01457 which was issued 01/07/03, the permittee shall record the cumulative OC emission rates from cleanup material and mold release usage for each calendar month;

h. beginning after the first 12 calendar months of operation following the issuance of PTI #15-01457 which was issued 01/07/03, the rolling, 12-month summation of the VOC emission rates from mold release usage; and

i. during the first 12 calendar months of operation following the issuance of PTI #15-01457 which was issued 01/07/03, the permittee shall record the cumulative VOC emission rates from mold release usage rate for each calendar month.

5. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

6. Records shall be maintained when more than two of the following emission units are being operated with P008 concurrently: P004, P005, P006, P007.

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

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

*With the use of the dry filtration system, the particulate emissions from this emissions unit should be very minor; therefore, monthly visible emission checks should be sufficient to ensure ongoing compliance with the particulate emission limitations.

III. Monitoring and/or Record Keeping Requirements (continued)

8. The permittee shall perform monthly* checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions of fugitive dust from the building enclosing this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the location where the fugitive dust is escaping the building;
e. the total duration of any visible emission incident; and
f. any corrective actions taken to eliminate the visible emissions.

*With the use of the dry filtration system, the particulate emissions from this emissions unit should be very minor; therefore, monthly visible emission checks should be sufficient to ensure ongoing compliance with the particulate emission limitations.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the number of pounds of each cleanup material employed that was not acetone.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the number of pounds of noncomplying resin (i.e., for weight fraction of styrene monomer) employed.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month resin combined usage limitation of 375.2 tons/yr for emissions units P007 and P008, and, for the first 12 calendar months of operation following the issuance of PTI #15-01457 which was issued 01/07/03, all exceedances of the maximum allowable cumulative combined resin usage.

4. The permittee shall notify the Canton local air agency in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days after the event occurs.

5. The permittee shall submit quarterly deviation (excursion) reports that identify any times when emissions unit P008 was operating and more than two of the following emissions units were also operating concurrently: P004, P005, P006, and P007.

6. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month facility-wide VOC emissions limitation of 2.5 tons/yr from the usage of mold release and, for the first 12 calendar months of operation following the issuance of PTI #15-01457which was issued 01/07/03, all exceedances of the maximum allowable cumulative facility-wide VOC emissions limitation from the use of mold release.

7. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month facility-wide OC emissions limitation of 8.5 tons/yr from the usage of mold release and cleanup material and, for the first 12 calendar months of operation following the issuance of PTI #15-01457 which was issued 01/07/03, all exceedances of the maximum allowable cumulative facility-wide OC emissions limitation from the use of mold release and cleanup material.

8. The permittee shall submit quarterly deviation (excursion) reports that identify any use of spray equipment by this emissions unit that did not meet the definition of Non-atomized Application Equipment found in section A.II.8.

9. The permittee shall submit quarterly deviation (excursion) reports that identify any use of resins that did not meet the definition of vapor suppressant resin.

10. Except as otherwise specified, the above reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1)(c).

IV. Reporting Requirements (continued)

11. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Canton local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

12. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions of fugitive dust were observed escaping from the building enclosing this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Canton local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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:

Styrene emissions from this emissions unit shall not exceed 22.2 lbs/hr. (This hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.)

Applicable Compliance Method:

The hourly emissions limitation represents the potential to emit for this emissions unit, i.e., the maximum usage rate of 500 lbs of resin/hr and the maximum monomer weight percent allowed under the restrictions of this permit (44%).

The emission factor shall be calculated using Table 1 of the subpart for mechanical non-atomized resin application using a vapor-suppressed resin with VSE factor of 0.3475 and with maximum monomer weight percent of 44%.

Emission Factor = ((0.157 x mass fraction styrene) - 0.0165) x 2,000 x (1 - (0.45 x VSE factor))

Emission Factor = 88.7 lbs styrene emitted per ton of resin used

Hourly Styrene Emissions = 500 lbs resin/hr x 1 ton/2000 lbs x 88.7 lbs styrene/ton

Hourly Styrene Emissions = 22.2 lbs styrene/hr

Therefore, no additional requirements are necessary to show compliance with this limit.

Note that after the VSE factor has been redetermined as provided by this permit, the redetermined value shall be used in this compliance calculation.

V. Testing Requirements (continued)

1.b Emission Limitation:

VOC emissions from this emissions unit shall not exceed 23.9 lbs/hr. (The hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.)

Applicable Compliance Method:

The hourly emissions limitation represents the potential to emit for this emissions unit, i.e., the maximum usage rate of 500 lbs of resin/hr and the maximum monomer weight percent allowed under the restrictions of this permit (44%).

The emission factor shall be calculated using Table 1 of the subpart for non-atomized mechanical resin application using a vapor-suppressed resin with VSE factor of 0.3475 and with maximum monomer weight percent of 44%.

Emission Factor = ((0.157 x mass fraction styrene) - 0.0165) x 2,000 x (1 - (0.45 x VSE factor))

Emission Factor = 88.7 lbs styrene emitted per ton of resin used

Hourly VOC Emissions = 500 lbs resin/hr x 1 ton/2000 lbs x 88.7 lbs styrene/ton

Hourly VOC Emissions = 22.2 lbs styrene/hr

The average maximum VOC emissions from the use of mold release is 1.7 lbs/hr.

Hourly VOC emissions = 22.2 lbs VOC/hr + 1.7 lbs VOC/hr

Hourly VOC emissions = 23.9 lbs VOC/hr

Therefore, no additional requirements are necessary to show compliance with this limit.

V. Testing Requirements (continued)

1.c Emission Limitation:

OC emissions from this emissions unit shall not exceed 27.9 lbs/hr. (This hourly allowable represents the maximum production capacity of this emissions unit; so, no hourly record keeping is required to demonstrate compliance.)

Applicable Compliance Method:

The hourly emissions limitation represents the potential to emit for this emissions unit, i.e., the maximum usage rate of 500 lbs of resin/hr and the maximum monomer weight percent allowed under the restrictions of this permit (44%).

The emission factor shall be calculated using Table 1 of the subpart for non-atomized mechanical resin application using a vapor-suppressed resin with VSE factor of 0.3475 and with maximum monomer weight percent of 44%.

Emission Factor = ((0.157 x mass fraction styrene) - 0.0165) x 2,000 x (1 - (0.45 x VSE factor))

Emission Factor = 88.7 lbs styrene emitted per ton of resin used

Hourly Styrene Emissions = 500 lbs resin/hr x 1 ton/2000 lbs x 88.7 lbs styrene/ton

Hourly Styrene Emissions = 22.2 lbs styrene/hr

The average maximum OC emissions from the use of mold release is 1.7 lbs/hr.

The maximum OC emissions from the use of cleanup materials is 4.0 lbs/hr.

Hourly OC emissions = 22.2 lbs OC/hr + 1.7 lbs OC/hr + 4.0 lbs OC/hr

Hourly OC emissions = 27.9 lbs OC/hr

Therefore, no additional requirements are necessary to show compliance with this limit.

1.d Emission Limitation:

The styrene emissions from this emissions unit shall not exceed 16.6 tons/yr.

Applicable Compliance Method:

The combined styrene emissions limit for emissions units P007 and P008 is 16.6 tons/yr. Therefore, the styrene emissions from this emissions unit cannot exceed 16.6 tons/yr.

V. Testing Requirements (continued)

1.e Emission Limitation:

The VOC emissions from this emissions unit shall not exceed 19.11 tons/yr.

Applicable Compliance Method:

The combined VOC/styrene emissions limit for emissions units P007 and P008 without mold release is 16.6 tons/yr. Therefore, the VOC emissions from this emissions unit without mold release cannot exceed 16.6 tons/yr.

The facility-wide VOC emissions limit from the use of mold release is 2.5 tons/yr.

Annual VOC emissions = 16.6 tons VOC/yr + 2.5 tons VOC/yr

Annual VOC emissions = 19.1 tons VOC/yr

Therefore, no additional requirements are necessary to show compliance with this limit.

1.f Emission Limitation:

The OC emissions from this emissions unit shall not exceed 25.11 tons/yr.

Applicable Compliance Method:

The combined OC emissions limit for emissions units P007 and P008 without mold release is 16.6 tons/yr. Therefore, the OC emissions from this emissions unit without mold release cannot exceed 16.6 tons/yr.

The facility-wide OC emissions limit from the use of mold release is 2.5 tons/yr.

The facility-wide OC emissions limit from the use of cleanup material is 6 tons/yr.

Annual OC emissions = 16.6 tons OC/yr + 2.5 tons OC/yr + 6 tons/yr

Annual OC emissions = 25.1 tons OC/yr

Therefore, no additional requirements are necessary to show compliance with this limit.

1.g Emission Limitation:

The combined styrene emissions from emissions units P007 and P008 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage.

Applicable Compliance Method:

Annual Styrene Emissions = 375.2 tons/yr x 88.7 lbs/ton x 1 ton/2000 lbs

Annual Styrene Emissions = 16.6 tons/yr

Compliance shall be demonstrated by monitoring and record keeping of resin usage found in section A.III.2.

V. Testing Requirements (continued)

1.h Emission Limitation:

The combined VOC emissions from emissions units P007 and P008 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of resin usage. (This limit does not include VOC emissions generated by the use of mold release.)

Applicable Compliance Method:

Annual Styrene Emissions = 375.2 tons/yr x 88.7 lbs/ton x 1 ton/2000 lbs

Annual Styrene Emissions = 16.6 tons/yr

Annual VOC Emissions = 16.6 tons/yr

Compliance shall be demonstrated by monitoring and record keeping found in section A.III.2.

1.i Emission Limitation:

The combined OC emissions from emissions units P007 and P008 shall not exceed 16.6 tons/yr. To achieve this limit, the maximum amount of resin usage shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage. (This limit does not include OC emissions generated by the use of mold release and cleanup material.)

Applicable Compliance Method:

Annual OC Emissions = 375.2 tons/yr x 88.7 lbs/ton x 1 ton/2000 lbs

Annual OC Emissions = 16.6 tons/yr

Compliance shall be demonstrated by monitoring and record keeping of resin usage found in section A.III.2.

1.j Emission Limitation:

The combined VOC emissions from the use of mold release from this entire facility shall not exceed 2.5 tons/yr based upon a rolling, 12-month summation of the VOC emissions.

Applicable Compliance Method:

Compliance shall be demonstrated by monitoring and record keeping found in section A.III.4.

1.k Emission Limitation:

The combined OC emissions from the use of mold release and cleanup material from this entire facility shall not exceed 8.5 tons/yr based upon a rolling, 12-month summation of the OC emissions.

Applicable Compliance Method:

Compliance shall be demonstrated by monitoring and record keeping found in sections A.III.3 and A.III.4.

V. Testing Requirements (continued)

1.l Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with the method and procedures specified in OAC rule 3745-17-03(B)(1).

1.m Emission Limitation:

Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with the method and procedures specified in OAC rule 3745-17-03(B)(3).

1.n Emission Limitation:

Particulate emissions shall not exceed 2.1 lbs/hr.

Applicable Compliance Method:

If required, compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

2. Compliance with the operational restrictions in section A.II of these terms and conditions shall be determined in accordance with the following methods:

2.a Operational Restriction:

The maximum amount of combined resin usage for emissions units P007 and P008 shall not exceed 375.2 tons/yr, based upon a rolling, 12-month summation of the resin usage.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of resin usage as specified in section A.III.2.

2.b Operational Restriction:

The maximum styrene monomer weight percent, as applied, for the resins employed in this emissions unit shall not exceed forty-four percent (44%).

Applicable Compliance Method:

The percent styrene monomer content shall be determined in accordance with 40 CFR 63.5797. Compliance shall be achieved based on the monitoring and record keeping of resin usage as specified in section A.III.1.

V. Testing Requirements (continued)

2.c Operational Limitation:

The only cleanup material the permittee shall employ in this facility shall be acetone, which has a density of 6.6 lbs OC/gallon, as applied.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of acetone usage as specified in section A.III.1.

2.d Operational Restriction:

The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping specified in section A.III.5.

2.e Operational Restriction:

When emissions unit P008 is being operated, no more than two of the following emissions units may be operated concurrently: P004, P005, P006, and P007.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of emissions units' operating schedules as specified in section A.III.6.

2.f Operational Restriction:

The permittee shall utilize Non-atomized Application Equipment in this emissions unit. Non-atomized Application Equipment means the following:

i. flow coat nozzles for gel coat application equipment;

ii. flow coat nozzle and chopper chute for resin and glass application equipment; and

iii. pressure fed roller equipment.

(For further details, see the CFA's "Controlled Spray Handbook dated 09/98".)

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of the use of Non-atomized Application Equipment as specified in section A.III.1.c.

2.g Operational Restriction:

The permittee shall only employ vapor suppressant resins.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and record keeping of resin usage as specified in section A.III.1.d.

V. Testing Requirements (continued)

3. The permittee shall determine or have determined the vapor suppressant effectiveness (VSE) factor of the resin(s) utilized in this emissions unit using the "Vapor Supressant Effectiveness Test Protocol" in Appendix A of 40 CFR Part 63, Subpart WWWW within 180 days of the issuance of this permit.

A comprehensive written report on the results of VSE factor determination(s) shall be signed by the persons responsible for the determination(s) and shall be submitted to the Director and to the Canton City Health Department, Air Pollution Control Division within 30 days following completion of the determination(s). The written report shall include the completed Table 17.1, worksheet 17.2 and worksheet 17.3 of the protocol and revised calculations of the calculations shown in terms and conditions A.V.1.a, A.V.1.b, and A.V.1.c using the newly determined VSE Factor.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Spray lay-up station No. 4: mechanical, non-atomized spraying of fiberglass and vapor suppressed resin onto molds in the South building using one spray lay-up gun to produce reinforced plastic composites utilizing fiberglass, vapor suppressed resin, MEKP as catalyst, mold release, and acetone as clean-up solvent with dry filtration system to control particulate emissions.		See section B.III.1.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for these five emissions units (P004, P005, P006, P007, and P008) for the emissions of styrene was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. Using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for "worst case" pollutant:

Pollutant: styrene

TLV (ug/m3): 85,200

Maximum Hourly Emission Rate from P004, P005, P006, P007, and P008 (lbs/hr): 81.66 lbs/hour

Predicted 1-Hour Maximum Ground-Level
Concentration at the Fenceline (ug/m3): 1,792

MAGLC (ug/m3): 2,028 (85,200 ug/m3 divided by 42)

III. Monitoring and/or Record Keeping Requirements (continued)

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials) or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV previously modeled;

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

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

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the changes(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (V)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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ATTACHMENT #1

Tables to Subpart WWWW of Part 63

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 required in §§63.5796, 63.5799(a)(1) and (b), and 63.5810(a)(1), to calculate organic HAP emissions factors for specific open molding and centrifugal casting process streams you must use the equations in the following table:

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) [a, b, c]...	Use this organic HAP emissions Factor (EF) Equation for materials with 33 percent or more organic HAP (19 percent for nonatomized gel coat) [a, b, c]...
1.open molding operation	a. manual resin application	i. nonvapor-suppressed resin	EF = 0.126 x % HAP x 2000	EF = ((0.286 x %HAP)-0.0529) x 2000
		ii. vapor-suppressed resin	EF = 0.126 x % HAP x 2000 x (1-(0.5 x VSE factor))	EF = ((0.286 x %HAP)-0.0529) x 2000 x (1-(0.5 x VSE factor))
		iii. vacuum bagging/closed-mold curing with roll out	EF = 0.126 x % HAP x 2000 x 0.8	EF = ((0.286 x %HAP)-0.0529) x 2000 x 0.8
		iv. vacuum bagging/`closed-mold curing without roll-out	EF = (0.126 x % HAP x 2000 x 0.5	EF = ((0.286 x %HAP)-0.0529) x 2000 x 0.5
	b. atomized mechanical resin application	i. nonvapor-suppressed resin	EF = 0.169 x %HAP x 2000	EF = ((0.714 x %HAP)-0.18) x 2000
		ii. vapor-suppressed resin	EF = 0.169 x %HAP x 2000 x (1-(0.45 x VSE factor))	EF = ((0.714 x %HAP)-0.18) x 2000 x (1-(0.45 x VSE factor))
		iii. vacuum bagging/closed-mold curing with roll-out	EF = 0.169 x %HAP x 2000 x 0.85	EF = ((0.714 x %HAP)-0.18) x 2000 x 0.85
		iv. vacuum bagging/closed-mold curing without roll-out	EF = 0.169 x %HAP x 2000 x 0.55	EF = ((0.714 x %HAP)-0.18) x 2000 x 0.55
	c. nonatomized mechanical resin application	v. nonvapor-suppressed resin	EF = 0.107 x %HAP x 2000	EF = ((0.157 x %HAP)-0.0165) x 2000
		vi. vapor-suppressed resin	EF = 0.107 x %HAP x 2000 x (1-(0.45 x VSE factor))	EF = ((0.157 x %HAP)-0.0165) x 2000 x (1-(0.45 x VSE factor))
		vii. closed-mold curing with roll-out	EF = 0.107 x %HAP x 2000 x 0.85	EF = ((0.157 x %HAP)-0.0165) x 2000 x 0.85
		viii. vacuum bagging/closed-mold curing without roll-out	EF = 0.107 x %HAP x 2000 x 0.55	EF = ((0.157 x %HAP)-0.0165) x 2000 x 0.55
	d. atomized mechanical resin application with robotic or automated spray control [d]	nonvapor-suppressed resin	EF = 0.169 x %HAP x 2000 x 0.77	EF = 0.77 x ((0.714 x %HAP)-0.18) x 2000
	e. filament application [e]	i. nonvapor-suppressed resin	EF = 0.184 x %HAP x 2000	EF = ((0.2746 x %HAP)-0.0298) x 2000
		ii. vapor-suppressed resin	EF = 0.12 x %HAP x 2000	EF = ((0.2746 x %HAP)-0.0298) x 2000 x 0.65
	f. atomized spray gel coat application	nonvapor-suppressed gel coat	EF = 0.446 x %HAP x 2000	EF = ((1.03646 x %HAP)-0.195) x 2000
	g. nonatomized spray gel coat application	nonvapor-suppressed gel coat	EF = 0.185 x %HAP x 2000	EF = ((0.4506 x %HAP)-0.0505) x 2000
	h. manual gel coat application [f]	nonvapor-suppressed gel coat	EF = 0.126 x % HAP x 2000 (for emissions estimation only, see footnote f)	EF = ((0.286 x %HAP)-0.0529) x 2000 (for emissions estimation only, see footnote f)
2. centrifugal casting operations [g]	heated air blown through molds	nonvapor-suppressed resin	EF = 0.558 x (%HAP) x 2000	EF = 0.558 x (%HAP) x 2000

	vented molds, but air vented through the molds is not heated	nonvapor-suppressed resin	EF = 0.026 x (%HAP) x 2000	EF = 0.026 x (%HAP) x 2000

Footnotes to Table 1

[a] 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 §63.5810. The organic HAP emissions factors have units of lbs of organic HAP per ton of resin or gel coat applied.

[b] 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.

[c] 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.

[d] 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.

[e] 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.

[f] Do not use this equation for determining compliance with emission limits in Tables 3 or 5 to this subpart. To determine compliance with emission limits you must treat all gel coat as if were applied as part of your gel coat spray application operations. If you apply gel coat by manual techniques only, you must treat the gel coat as if it were applied with atomized spray and use Equation 1.f. to determine compliance with the appropriate emission limits in Tables 3 or 5 to this subpart. To estimate emissions from manually applied gel coat, you may either include the gel coat quantities you apply manually with the quantities applied using spray, or use this equation to estimate emissions from the manually applied portion of your gel coat.

[g] 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.

[h] 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 2 to Subpart WWWW of Part 63 - Compliance Dates for New and Existing Reinforced Plastic Composites Facilities

As required in §§63.5800 and 63.5840 you must demonstrate compliance with the standards by the dates in the following table:

If your facility is...	and...	then you must comply by this date:
1. an existing source	a. is a major source on or before the publication date of this subpart	i. **[INSERT DATE 3 YEARS FROM PUBLICATION OF THIS FINAL RULE IN THE FEDERAL REGISTER]**, or ii. you must accept and meet an enforceable HAP emissions limit below the major source threshold prior to **[INSERT DATE 3 YEARS FROM PUBLICATION OF THIS FINAL RULE IN THE FEDERAL REGISTER]**.
2. an existing source that is an area source	becomes a major source after the publication date of this subpart	3 years after becoming a major source or **[INSERT DATE 3 YEARS FROM PUBLICATION OF THIS FINAL RULE IN THE FEDERAL REGISTER]**, whichever is later.
3. an existing source, and emits less than 100 tpy of organic HAP from the combination of all centrifugal casting and continuous lamination/casting operations at the time of initial compliance with this subpart	subsequently increases its actual organic HAP emissions to 100 tpy or more from these operations, which requires that the facility must now comply with the standards in §63.5805(b)	3 years of the date your semi-annual compliance report indicates your facility meets or exceeds the 100 tpy threshold.
4. a new source	is a major source at startup	upon startup or **[INSERT DATE OF PUBLICATION OF THIS FINAL RULE IN THE FEDERAL REGISTER]**, whichever is later.

5. a new source	is an area source at startup and becomes a major source	immediately upon becoming a major source.
6. a new source, and emits less than 100 tpy of organic HAP from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC and BMC manufacturing, and mixing operations at the time of initial compliance with this subpart	subsequently increases its actual organic HAP emissions to 100 tpy or more from the combination of these operations, which requires that the facility must now meet the standards in §63.5805(d)	3 years from the date that your semi-annual compliance report indicates your facility meets or exceeds the 100 tpy threshold.

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 required in §§63.5796, 63.5805 (a) through (c) and (g), 63.5810(a), (b), and (d), 63.5820(c), 63.5830, 63.5835(a), 63.5895(c) and (d), 63.5900(a)(2), and 63.5915(c), you must meet the appropriate organic HAP emissions limits in the following table:

If your operation type is...	And you use...	Your organic HAP emissions limit is [a]...	And the highest organic HAP content for a compliant resin or gel coat is [b]...
1. open molding - corrosion-resistant and/or high strength (CR/HS)	a. mechanical resin application	112 lb/ton	46.2 with nonatomized resin application
	b. filament application	171 lb/ton	42.0
	c. manual resin application	123 lb/ton	40.0
2. open molding - non-CR/HS	a. mechanical resin application	87 lb/ton	38.4 with nonatomized resin application
	b. filament application	188 lb/ton	45.0
	c. manual resin application	87 lb/ton	33.6
3. open molding - tooling	a. mechanical resin application	254 lb/ton	43.0 with atomized application, 91.4 with nonatomized application
	b. manual resin application	157 lb/ton	45.9
4. open molding - low-flame spread/low-smoke products	a. mechanical resin application	497 lb/ton	60.0
	b. filament application	270 lb/ton	60.0
	c. manual resin application	238 lb/ton	60.0
5. open molding - shrinkage controlled resins	a. mechanical resin application	354 lb/ton	50.0
	b. filament application	215 lb/ton	50.0
	c. manual resin application	180 lb/ton	50.0
6. open molding - gel coat [c]	a. tooling gel coating	437 lb/ton	40.0
	b. white/off white pigmented gel coating	267 lb/ton	30.0
	c. all other pigmented gel coating	377 lb/ton	37.0
	d. CR/HS or high performance gel coat	605 lb/ton	48.0
	e. fire retardant gel coat	854 lb/ton	60.0
	f. clear production gel coat	522 lb/ton	44.0
7. [d, e] centrifugal casting - CR/HS	N/A	25 lb/ton	48.0
8. centrifugal casting - non-CR/HS [d, e]	N/A	20 lb/ton	37.5
9. pultrusion [f]	N/A	reduce total organic HAP emissions by at least 60 weight percent	NA
10. continuous lamination/ casting	N/A	reduce total organic HAP emissions by at least 58.5 weight percent or not exceed a organic HAP emissions limit of 15.7 lbs of organic HAP per ton of neat resin plus and neat gel coat plus	NA

Footnotes to Table 3

[a] 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.

[b] A compliant resin or gel coat means that if its organic HAP content is used to calculate an organic HAP emissions factor, the factor calculated does not exceed the appropriate organic HAP emissions limit shown in the table.

[c] These limits are for spray application of gel coat. Manual gel coat application must be included as part of spray gel coat application for compliance purposes using the same organic HAP emissions factor equation and organic HAP emissions limit. If you only apply gel coat with manual application, treat the manually applied gel coat as if it were applied with atomized spray for compliance determinations.

[d] Centrifugal casting operations where the mold is not vented during spinning and cure are considered to be closed molding and are not subject to any emissions limit. Centrifugal casting operations where the mold is not vented during spinning and cure, and the resin is applied to the open centrifugal casting mold using mechanical or manual open molding resin application techniques are considered to be open molding operations and the appropriate open molding emission limits apply.

[e] Centrifugal casting operations where the mold is vented during spinning and the resin is applied to the open centrifugal casting mold using mechanical or manual open molding resin application techniques, use the appropriate centrifugal casting emission limit to determine compliance. Calculate your emission factor using the appropriate centrifugal casting emission factor in Table 1 to this subpart, or a site specific emission factor as discussed in §63.5796.

[f] Pultrusion machines that produce parts with 1000 or more reinforcements and a cross sectional area of 60 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.

Table 4 to Subpart WWWW of Part 63 - Work Practice Standards

As required in §§63.5805 (a) through (d) and (g), 63.5835(a), 63.5900(a)(3), 63.5910(c)(5), and 63.5915(d), you must meet the appropriate work practice standards in the following table:

For....	You must....
1. a new or existing closed molding operation using compression/injection molding	uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.
2. a new or existing cleaning operation	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.
3. a new or existing materials HAP-containing materials storage operation	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.
4. an existing or new SMC manufacturing operation	close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open.
5. an existing or new SMC manufacturing operation	use a nylon containing film to enclose SMC.
6. an existing or new mixing or BMC manufacturing operation	use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
7. an existing mixing or BMC manufacturing operation	close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety.

8. a new or existing mixing or BMC manufacturing operation [a]	keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
9. a new or existing pultrusion operation manufacturing parts with 1,000 or more reinforcements and a cross section area of 60 square inches or more that is not subject to the 95 percent organic HAP emission reduction requirement	i. not allow vents from the building ventilation system, or local or portable fans to blow directly on or across the wet-out area(s), ii. not permit point suction of ambient air in the wet-out area(s) unless that air is directed to a control device, iii. use devices such as deflectors, baffles, and curtains when practical to reduce air flow velocity across the wet-out area(s), iv. direct any compressed air exhausts away from resin and wet-out area(s), v. convey resin collected from drip-off pans or other devices to reservoirs, tanks, or sumps via covered troughs, pipes, or other covered conveyance that shields the resin from the ambient air, vi. cover all reservoirs, tanks, sumps, or HAP-containing materials storage vessels except when they are being charged or filled, and vii. cover or shield from ambient air resin delivery systems to the wet-out area(s) from reservoirs, tanks, or sumps where practical.

[a] Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of 500 square inches or less may be open while active mixing is taking place.

Table 5 to Subpart WWWW of Part 63 - Alternative Organic HAP Emissions Limits for Open Molding, Centrifugal Casting, and SMC Manufacturing Operations Where the Standard is Based on a 95 Percent Reduction Requirement

As specified in §§63.5796, 63.5805(b) and (d), 63.5810(a) and (b), 63.5835(a), 63.5895(c), 63.5900(a)(2), and 63.5915(c), as an alternative to the 95 percent

organic HAP emissions reductions requirement, you may meet the appropriate organic HAP emissions limits in the following table:

If your operation type is...	**And you use...**	**Your organic HAP emissions limit is [a]...**
1. open molding - corrosion-resistant and/or high strength (CR/HS)	a. mechanical resin application	6 lb/ton
	b. filament application	9 lb/ton
	c. manual resin application	7 lb/ton
2. open molding - non-CR/HS	a. mechanical resin application	13 lb/ton
	b. filament application	10 lb/ton
	c. manual resin application	5 lb/ton
3. open molding - tooling	a. mechanical resin application	13 lb/ton
	b. manual resin application	8 lb/ton
4. open molding - low flame spread/low smoke products	a. mechanical resin application	25 lb/ton
	b. filament application	14 lb/ton
	c. manual resin application	12 lb/ton
5. open molding - shrinkage controlled resins	a. mechanical resin application	18 lb/ton
	b. filament application	11 lb/ton
	c. manual resin application	9 lb/ton
6. open molding - gel coat [b]	a. tooling gel coating	22 lb/ton
	b. white/off white pigmented gel coating	22 lb/ton
	c. all other pigmented gel coating	19 lb/ton
	d. CR/HS or high performance gel coat	31 lb/ton
	e. fire retardant gel coat	43 lb/ton
	f. clear production gel coat	27 lb/ton
7. centrifugal casting - CR/HS [c, d]	a vent system that moves heated air through the mold	27 lb/ton
8. centrifugal casting - non-CR/HS [c, d]	a vent system that moves heated air through the mold	21 lb/ton

7. centrifugal casting - CR/HS [c, d]	a vent system that moves ambient air through the mold	2 lb/ton
8. centrifugal casting - non-CR/HS [c, d]	a vent system that moves ambient air through the mold	1 lb/ton
9. SMC Manufacturing	N/A	2.4 lb/ton

[a] Organic HAP emissions limits for open molding and centrifugal casting expressed as lb/ton are calculated using the equations shown in Table 1 to this subpart. You must be at or below these values based on a 12-month rolling average.

[b] These limits are for spray application of gel coat. Manual gel coat application must be included as part of spray gel coat application for compliance purposes using the same organic HAP emissions factor equation and organic HAP emissions limit. If you only apply gel coat with manual application, treat the manually applied gel coat as if it were applied with atomized spray for compliance determinations.

[C] Centrifugal casting operations where the mold is not vented during spinning and cure are considered to be closed molding and are not subject to any emissions limit. Centrifugal casting operations where the mold is not vented during spinning and cure, and the resin is applied to the open centrifugal casting mold using mechanical or manual open molding resin application techniques are considered to be open molding operations and the appropriate open molding emission limits apply.

[d] Centrifugal casting operations where the mold is vented during spinning and the resin is applied to the open centrifugal casting mold using mechanical or manual open molding resin application techniques, use the appropriate centrifugal casting emission limit to determine compliance. Calculate your emission factor using the appropriate centrifugal casting emission factor in Table 1 to this subpart, or a site specific emission factor as discussed in §63.5796.

Table 6 to Subpart WWWW of Part 63 - Basic Requirements for Performance Tests, Performance Evaluations, and Design Evaluations for New and Existing Sources Using Add-On Control Devices

As required in §63.5850 you must conduct performance tests, performance evaluations, and design evaluation according to the requirements in the following table:

For ...	You must ...	Using ...	According to the following requirements.

1. each enclosure used to collect and route organic HAP emissions to an add-on control device that is a PTE	meet the requirements for a PTE	EPA method 204 of appendix M of 40 CFR part 51	Enclosures that meet the requirements of EPA Method 204 of appendix M of 40 CFR part 51 for a PTE are assumed to have a capture efficiency of 100%. Note that the criteria that all access doors and windows that are not treated as natural draft openings shall be closed during routine operation of the process is not intended to require that these doors and windows be closed at all times. It means that doors and windows must be closed any time that you are not actually moving parts or equipment through them. Also, any styrene retained in hollow parts and liberated outside the PTE is not considered to be a violation of the EPA Method 204 criteria.

2. each enclosure used to collect and route organic HAP emissions to an add-on control device that is not a PTE	a. determine the capture efficiency of each enclosure used to capture organic HAP emissions sent to an add-on control device	i. EPA methods 204B through E of appendix M of 40 CFR part 51, or	(1) Enclosures that do not meet the requirements for a PTE must determine the capture efficiency by constructing a temporary total enclosure according to the requirements of EPA Method 204 of appendix M of 40 CFR part 51 and measuring the mass flow rates of the organic HAP in the exhaust streams going to the atmosphere and to the control device. Test runs for EPA Methods 204B through E of appendix M of 40 CFR part 51 must be at least 3 hours.
		ii. an alternative test method that meets the requirements in 40 CFR part 51, appendix M.	(1) The alternative test method must the data quality objectives and lower confidence limit approaches for alternative capture efficiency protocols requirements contained in 40 CFR part 63 subpart KK, appendix A.
3. each control device used to comply with a percent reduction requirement, or a organic HAP emissions limit	determine the control efficiency of each control device used to control organic HAP emissions	the test methods specified in §63.5850 to this subpart.	Testing and evaluation requirements are contained in 40 CFR part 63, subpart SS, and §63.5850 to this subpart.

4. Determining organic HAP emission factors for any operation	determine the mass organic HAP emissions rate	the test methods specified in §63.5850 to this subpart.	Testing and evaluation requirements are contained in 40 CFR part 63, subpart SS, and §63.5850 to this subpart.

Table 7 to Subpart WWWW of Part 63 - Options Allowing Use of the Same Resin Across Different Operations That Use the Same Resin Type

As required in §§63.5810(a) through (d), 63.5835(a), 63.5895(c), and 63.5900(a)(2), when electing to use the same resin(s) for multiple resin application methods you may use any resin(s) with an organic HAP contents less than or equal to the values shown in the following table, or any combination of resins whose weighted average organic HAP content based on a 12-month rolling average is less than or equal to the values shown the following table:

If your facility has the following resin type and application method...	The highest resin weight percent organic HAP content, or weighted average weight percent organic HAP content, you can use for...	is...
1. CR/HS resins, centrifugal casting	a. CR/HS mechanical	48.0
	b. CR/HS filament application	48.0
	c. CR/HS manual	48.0
2. CR/HS resins, nonatomized mechanical	a. CR/HS filament application	46.2
	b. CR/HS manual	46.2
3. CR/HS resins, filament application	CR/HS manual	42.0
4. non-CR/HS resins, filament application	a. non-CR/HS mechanical	45.0
	b. non-CR/HS manual	45.0
	c. non-CR/HS centrifugal casting	45.0
5. non-CR/HS resins, nonatomized mechanical	a. non-CR/HS manual	38.4
	b. non-CR/HS centrifugal casting	38.4
6. non-CR/HS resins, centrifugal casting	non-CR/HS manual	37.5
7. tooling resins, nonatomized mechanical	tooling manual	91.4
8. tooling resins, manual	tooling atomized mechanical	45.9

Table 8 to Subpart WWWW of Part 63 - Initial Compliance With organic HAP Emissions Limits

As required in §63.5860(a), you must demonstrate initial compliance with organic HAP emissions limits as specified in the following table:

For ...	That must meet the following organic HAP emissions limit...	You have demonstrated initial compliance if...
1. open molding and centrifugal casting operations	a. a organic HAP emissions limit shown in Tables 3 or 5 to this subpart, or an organic HAP content limit shown in Table 7 to this subpart	i. you have met the appropriate organic HAP emissions limits for these operations as calculated using the procedures in §63.5810 on a 12-month rolling average 1 year after the appropriate compliance date, or ii. you demonstrate by using the appropriate values in Tables 3, or 7 to this subpart that all resins and gel coats considered individually meet the appropriate organic HAP contents, or iii. you demonstrate by using the appropriate values in Table 7 to this subpart that the weighted average of all resins and gel coats for each resin type and application method meet the appropriate organic HAP contents.
2. open molding, centrifugal casting, continuous lamination/ casting, SMC and BMC manufacturing, and mixing operations	a. reduce total organic HAP emissions by at least 95 percent by weight	total organic HAP emissions, based on the results of the capture efficiency and destruction efficiency testing specified in Table 6 to this subpart, are reduced by at least 95 percent by weight.

3.continuous lamination/ casting operations	a. reduce total organic HAP emissions by at least 58.5 weight percent, or	total organic HAP emissions, based on the results of the capture efficiency and destruction efficiency testing specified in Table 6 to this subpart and the calculation procedures specified in §§63.5865 through 63.5890, are reduced by at least 58.5 percent by weight.
	b. not exceed an organic HAP emissions limit of 15.7 lbs of organic HAP per ton of neat resin plus and neat gel coat plus	total organic HAP emissions, based on the results of the capture efficiency and destruction efficiency testing specified in Table 6 to this subpart and the calculation procedures specified in §§63.5865 through 63.5890, do not exceed 15.7 lbs of organic HAP per ton of neat resin plus and neat gel coat plus.
4.continuous lamination/ casting operations	a. reduce total organic HAP emissions by at least 95 weight percent or	total organic HAP emissions, based on the results of the capture efficiency and destruction efficiency testing specified in Table 6 to this subpart and the calculation procedures specified in §§63.5865 through 63.5890, are reduced by at least 95 percent by weight.
	b. not exceed an organic HAP emissions limit of 1.47 lbs of organic HAP per ton of neat resin plus and neat gel coat plus	total organic HAP emissions, based on the results of the capture efficiency and destruction efficiency testing specified in Table 6 and the calculation procedures specified in §§63.5865 through 63.5890, do not exceed 1.47 lbs of organic HAP per ton of neat resin plus and neat gel coat plus.

5.pultrusion operations	a. reduce total organic HAP emissions by at least 60 percent by weight	i. total organic HAP emissions, based on the results of the capture efficiency and add-on control device destruction efficiency testing specified in Table 6 to this subpart, are reduced by at least 60 percent by weight, and ii. as part of the notification of initial compliance status, the owner/operator submits a certified statement that all pultrusion lines not controlled with an add-on control device are using direct die injection, preform injection, and/or wet-area enclosures that meet the criteria of §63.5830.
6.pultrusion operations	a. reduce total organic HAP emissions by at least 95 percent by weight	i. total organic HAP emissions, based on the results of the capture efficiency and add-on control device destruction efficiency testing specified in Table 6 to this subpart, are reduced by at least 95 percent by weight.

Table 9 to Subpart WWWW of Part 63. Initial Compliance With Work Practice Standards

As required in §63.5860(a), you must demonstrate initial compliance with work practice standards as specified in the following table:

For ...	That must meet the following standard...	You have demonstrated initial compliance if...

1. a new or existing closed molding operation using compression/injection molding	uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.	the owner or operator submits a certified statement in the notice of compliance status that only one charge is uncovered, unwrapped or exposed per mold cycle per compression/injection molding machine, or prior to the loader, hoppers are closed except when adding materials, and materials are recovered after slitting.
2. a new or existing cleaning operation	not use cleaning solvents that contain HAP, except that styrene may be used in closed systems, and organic HAP containing materials may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin between storage and applying resin to the mold or reinforcement.	the owner or operator submits a certified statement 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.

3. a new or existing materials HAP-containing materials storage operation	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.	the owner or operator submits a certified statement 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.
4. an existing or new SMC manufacturing operation	close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open.	the owner or operator submits a certified statement in the notice of compliance status that the resin delivery system is closed or covered.
5. an existing or new SMC manufacturing operation	use a nylon containing film to enclose SMC.	the owner or operator submits a certified statement in the notice of compliance status that a nylon-containing film is used to enclose SMC.
6. an existing or new mixing or BMC manufacturing operation	use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.	the owner or operator submits a certified statement in the notice of compliance status that mixer covers are closed during mixing except when adding materials to the mixers, and that gaps around mixer shafts and required instrumentation are less than 1 inch.
7. an existing mixing or BMC manufacturing operation	not actively vent mixers to the atmosphere while the mixing agitator is turning, except that venting is allowed during addition of materials, or as necessary prior to adding materials for safety.	the owner or operator submits a certified statement in the notice of compliance status that mixers are not actively vented to the atmosphere when the agitator is turning except when adding materials or as necessary for safety.
8. a new or existing mixing or BMC manufacturing operation	keep the mixer covers closed during mixing except when adding materials to the mixing vessels.	the owner or operator submits a certified statement in the notice of compliance status that mixers closed except when adding materials to the mixing vessels.

9. a new or existing pultrusion operation manufacturing parts with 1000 or more reinforcements and a cross section area of 60 square inches or more that is not subject to the 95 percent organic HAP emission reduction requirement	i. not allow vents from the building ventilation system, or local or portable fans to blow directly on or across the wet-out area(s), ii. not permit point suction of ambient air in the wet-out area(s) unless that air is directed to a control device, iii. use devices such as deflectors, baffles, and curtains when practical to reduce air flow velocity across the wet-out area(s), iv. direct any compressed air exhausts away from resin and wet-out area(s), v. convey resin collected from drip-off pans or other devices to reservoirs, tanks, or sumps via covered troughs, pipes, or other covered conveyance that shields the resin from the ambient air, vi. cover all reservoirs, tanks, sumps, or HAP-containing materials storage vessels except when they are being charged or filled, and vii. cover or shield from ambient air resin	the owner or operator submits a certified statement in the notice of compliance status that they have complied with all the requirements listed in 9.i through 9.vii.

Table 10 to Subpart WWWW of Part 63 - Data Requirements for New and Existing Continuous Lamination Lines and Continuous Casting Lines Complying with a Percent Reduction Limit on a Per Line Basis

As required in §63.5865(a), in order to comply with a percent reduction limit for continuous lamination lines and continuous casting lines you must determine the data in the following table:

For each line where the wet-out area...	And the oven...	You must determine...
1. has an enclosure that is not a permanent total enclosure (PTE) and the captured organic HAP emissions are controlled by an add-on control device	a. is uncontrolled	i. annual uncontrolled wet-out area organic HAP emissions, ii. annual controlled wet-out area organic HAP emissions, iii. annual uncontrolled oven organic HAP emissions, iv the capture efficiency of the wet-out area enclosure, v. the destruction efficiency of the add-on control device, and vi. the amount of neat resin plus and neat gel coat plus applied.

2. has an enclosure that is a PTE and the captured organic HAP emissions are controlled by an add-on control device	a. is uncontrolled	i. annual uncontrolled wet-out area organic HAP emissions, ii. annual controlled wet-out area organic HAP emissions, iii. annual uncontrolled oven organic HAP emissions, iv. that the wet-out area enclosure meets the requirements of EPA Method 204 of appendix M to 40 CFR part 51 for a PTE, v. the destruction efficiency of the add-on control device, and vi. the amount of neat resin plus and neat gel coat plus applied.
3. is uncontrolled	a. is controlled by an add-on control device	i. annual uncontrolled wet-out area organic HAP emissions, ii. annual uncontrolled oven organic HAP emissions, iii. annual controlled oven organic HAP emissions, iv. the capture efficiency of the oven, v. the destruction efficiency of the add-on control device, and vi. the amount of neat resin plus and neat gel coat plus applied.

4. has an enclosure that is not a PTE and the captured organic HAP emissions are controlled by an add-on control device	a. is controlled by an add-on control device	i. annual uncontrolled wet-out area organic HAP emissions, ii. annual controlled wet-out area organic HAP emissions, iii. annual uncontrolled oven organic HAP emissions, iv. annual controlled oven organic HAP emissions; v. the capture efficiency of the wet-out area enclosure, vi. inlet organic HAP emissions to the add-on control device, vii. outlet organic HAP emissions from the add-on control device, and viii. the amount of neat resin plus and neat gel coat plus applied.
5. has an enclosure that is a PTE and the captured organic HAP emissions are controlled by an add-on control device	a. is controlled by an add-on control device	i. that the wet-out area enclosure meets the requirements of EPA Method 204 of appendix M to 40 CFR part 51 for a PTE, ii. the capture efficiency of the oven, and iii. the destruction efficiency of the add-on control device.

Table 11 to Subpart WWWW of Part 63 - Data Requirements for New and Existing Continuous Lamination and Continuous Casting Lines Complying with a Percent Reduction Limit or a Lbs/Ton Limit on an Averaging Basis

As required in §63.5865, in order to comply with a percent reduction limit or a lbs/ton limit on an averaging basis for continuous lamination lines and continuous casting lines you must determine the data in the following table:

For each ...	That ...	You must determine ...
1. wet-out area	is uncontrolled	annual uncontrolled wet-out area organic HAP emissions.

2. wet-out area	a. has an enclosure that is not a PTE	i. the capture efficiency of the enclosure, and ii. annual organic HAP emissions that escape the enclosure.
3. wet-out area	has an enclosure that is a PTE	that the enclosure meets the requirements of EPA Method 204 of appendix M to 40 CFR part 51 for a PTE.
4. oven	is uncontrolled	annual uncontrolled oven organic HAP emissions.
5. line	a. is controlled or uncontrolled	i. the amount of neat resin plus applied, and ii. the amount of neat gel coat plus applied.
6. add-on control device		i. total annual inlet organic HAP emissions, and total annual outlet organic HAP emissions.

Table 12 to Subpart WWWW of Part 63. Data Requirements for New and Existing Continuous Lamination Lines and Continuous Casting Lines Complying with a Lbs/Ton Organic HAP Emissions Limit on a Per Line Basis

As required in §63.5865(b), in order to comply with a lbs/ton organic HAP emissions limit for continuous lamination lines and continuous casting lines you must determine the data in the following table:

For each line where the wet-out area ...	And the oven ...	You must determine ...
1. is uncontrolled	a. is uncontrolled	i. annual uncontrolled wet-out area organic HAP emissions, ii. annual uncontrolled oven organic HAP emissions, and iii. annual neat resin plus and neat gel coat plus applied.

2. has an enclosure that is not a PTE and the captured organic HAP emissions are controlled by an add-on control device	a. is uncontrolled	i. annual uncontrolled wet-out area organic HAP emissions, ii. annual controlled wet-out area organic HAP emissions, iii. annual uncontrolled oven organic HAP emissions, iv. the capture efficiency of the wet-out area enclosure, v. the destruction efficiency of the add-on control device, and vi. the amount of neat resin plus and neat gel coat plus applied.
3. has an enclosure that is a PTE, and the captured organic HAP emissions are controlled by an add-on control device	a. is uncontrolled	i. annual uncontrolled wet-out area organic HAP emissions, ii. annual controlled wet-out area organic HAP emissions, iii. annual uncontrolled oven organic HAP emissions, iv. that the wet-out area enclosure meets the requirements of EPA Method 204 of appendix M to 40 CFR part 51 for a PTE, v. the destruction efficiency of the add-on control device, and vi. the amount of neat resin plus and neat gel coat plus applied.

4. is uncontrolled	a. is controlled by an add-on control device	i. annual uncontrolled wet-out area organic HAP emissions, ii. annual uncontrolled oven organic HAP emissions, iii. annual controlled oven organic HAP emissions, iv. the capture efficiency of the oven, v. the destruction efficiency of the add-on control device, and vi. the amount of neat resin plus and neat gel coat plus applied.
5. has an enclosure that is not a PTE and the captured organic HAP emissions are controlled by an add-on control device	a. is controlled by an add-on control device	i. annual uncontrolled wet-out area organic HAP emissions, ii. annual controlled wet-out area organic HAP emissions, iii. annual uncontrolled oven organic HAP emissions, iv. annual controlled oven organic HAP emissions, v. the capture efficiency of the wet-out area enclosure, vi. the capture efficiency of the oven, vii. the destruction efficiency of the add-on control device, and viii. the amount of neat resin plus and neat gel coat plus applied.

6. has an enclosure that is a PTE, and the captured organic HAP emissions are controlled by an add-on control device	a. is controlled by an add-on control device	i. that the wet-out area enclosure meets the requirements of EPA Method 204 of appendix M to 40 CFR part 51 for a PTE, ii. the capture efficiency of the oven, iii. inlet organic HAP emissions to the add-on control device, and iv. outlet organic HAP emissions from the add-on control device.

Table 13 to Subpart WWWW of Part 63. Applicability and Timing of Notifications

As required in §63.5905(a), you must determine the applicable notifications and submit them by the dates shown in the following table:

If your facility...	You must submit...	By this date.
1. is an existing source subject to this subpart	an Initial Notification containing the information specified in §63.9(b)(2)	no later than the dates specified in §63.9(b)(2).
2. is a new source subject to this subpart	the notifications specified in §63.9(b)(4) and (5)	no later than the dates specified §63.9(b)(4) and (5).
3. qualifies for a compliance extension as specified in §63.9(c)	a request for a compliance extension as specified in §63.9(c)	no later than the dates specified in §63.6(i).
4. is complying with organic HAP emissions limit averaging provisions	a Notification of Compliance Status as specified in §63.9(h)	no later than 1 year plus 30 days after your facility's compliance date.
5. is complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging	a Notification of Compliance Status as specified in §63.9(h)	no later than 30 calendar days after your facility's compliance date.
6. is complying by using an add-on control device	a. a notification of intent to conduct a performance test as specified in §63.9(e)	no later than the date specified in §63.9(e).
	b. a notification of the date for the CMS performance evaluation as specified in §63.9(g)	the date of submission of notification of intent to conduct a performance test.

	c. a Notification of Compliance Status as specified in §63.9(h)	no later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.

Table 14 to Subpart WWWW of Part 63 - Requirements for Reports

As required in §63.5910(a), (b), (g), and (h), you must submit reports on the schedule shown in the following table:

You must submit a(n)	The report must contain...	You must submit the report...
1. compliance report	a. a statement that there were no deviations during that reporting period if there were no deviations from any emission limitations (emission limit, operating limit, opacity limit, and visible emission limit) that apply to you and there were no deviations from the requirements for work practice standards in Table 4 to this subpart that apply to you. If there were no periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control as specified in §63.8(c)(7), the report must also contain a statement that there were no periods during which the CMS was out of control during the reporting period.	semiannually according to the requirements in §63.5910(b).
	b. the information in §63.5910(d) if you have a deviation from any emission limitation (emission limit, operating limit, or work practice standard) during the reporting period. If there were periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control, as specified in §63.8(c)(7), the report must contain the information in §63.5910(e).	semiannually according to the requirements in §63.5910(b).
	c. the information in §63.10(d)(5)(i) if you had a startup, shutdown or malfunction during the reporting period, and you took actions consistent with your startup, shutdown, and malfunction plan.	semiannually according to the requirements in §63.5910(b).

2. an immediate startup, shutdown, and malfunction report if you had a startup, shutdown, or malfunction during the reporting period that is not consistent with your startup, shutdown, and malfunction plan	a. actions taken for the event.	by fax or telephone within 2 working days after starting actions inconsistent with the plan.
	b. the information in §63.10(d)(5)(ii).	by letter within 7 working days after the end of the event unless you have made alternative arrangements with the permitting authority. (§63.10(d)(5)(ii)).

Table 15 to Subpart WWWW of Part 63 - Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63

As specified in §63.5925, the parts of the General Provisions which apply to you are shown in the following table:

The general provisions reference...	That addresses...	And applies to subpart WWWW of Part 63...	Subject to the following additional information...
§63.1(a)(1)	General applicability of the general provisions	Yes	Additional terms defined in subpart WWWW of Part 63, when overlap between subparts A and WWWW of Part 63 of this part, subpart WWWW of Part 63 takes precedence.

§63.1(a)(2) through (4)	General applicability of the general provisions	Yes	
§63.1(a)(5)	Reserved	No	
§63.1(a)(6)	General applicability of the general provisions	Yes	
§63.1(a)(7) through (9)	Reserved	No	
§63.1(a)(10) through (14)	General applicability of the general provisions	Yes	
§63.1(b)(1)	Initial applicability determination	Yes	Subpart WWWW of Part 63 clarifies the applicability in §§63.5780 and 63.5785.
§63.1(b)(2)	Reserved	No	
§63.1(b)(3)	Record of the applicability determination	Yes	
§63.1(c)(1)	Applicability of this part after a relevant standard has been set under this part	Yes	Subpart WWWW of Part 63 clarifies the applicability of each paragraph of subpart A to sources subject to subpart WWWW of Part 63.
§63.1(c)(2)	Title V operating permit requirement	Yes	All major affected sources are required to obtain a title V operating permit. Area sources are not subject to subpart WWWW of Part 63.
§63.1(c)(3) and (4)	Reserved	No	
§63.1(c)(5)	Notification requirements for an area source that increases HAP emissions to major source levels	Yes	
§63.1(d)	Reserved	No	

§63.1(e)	Applicability of permit program before a relevant standard has been set under this part	Yes	
§63.2	Definitions	Yes	Subpart WWWW of Part 63 defines terms in §63.5935. When overlap between subparts A and WWWW of Part 63 occurs, you must comply with the subpart WWWW of Part 63 definitions, which take precedence over the subpart A definitions.
§63.3	Units and abbreviations	Yes	Other units and abbreviations used in subpart WWWW of Part 63 are defined in subpart WWWW of Part 63.
§63.4	Prohibited activities and circumvention	Yes	§63.4(a)(3) through (5) is reserved and does not apply.
§63.5(a)(1) and (2)	Applicability of construction and reconstruction	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§63.5(b)(1)	Relevant standards for new sources upon construction	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§63.5(b)(2)	Reserved	No	
§63.5(b)(3)	New construction/ reconstruction	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§63.5(b)(4)	Construction/ reconstruction notification	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§63.5(b)(5)	Reserved	No	

§63.5(b)(6)	Equipment addition or process change	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§63.5(c)	Reserved	No	
§63.5(d)(1)	General application for approval of construction or reconstruction	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§63.5(d)(2)	Application for approval of construction	Yes	
§63.5(d)(3)	Application for approval of reconstruction	No	
§63.5(d)(4)	Additional information	Yes	
§63.5(e)(1) through (5)	Approval of construction or reconstruction	Yes	
§63.5(f)(1) and (2)	Approval of construction or reconstruction based on prior State preconstruction review	Yes	
§63.6(a)(1)	Applicability of compliance with standards and maintenance requirements	Yes	
§63.6(a)(2)	Applicability of area sources that increase HAP emissions to become major sources	Yes	
§63.6(b)(1) through (5)	Compliance dates for new and reconstructed sources	Yes	Subpart WWWW of Part 63 clarifies compliance dates in §63.5800.
§63.6(b)(6)	Reserved	No	

§63.6(b)(7)	Compliance dates for new operations or equipment that cause an area source to become a major source	Yes	New operations at an existing facility are not subject to new source standards.
§63.6(c)(1) and (2)	Compliance dates for existing sources	Yes	Subpart WWWW of Part 63 clarifies compliance dates in §63.5800.
§63.6(c)(3) and (4)	Reserved	No	
§63.6(c)(5)	Compliance dates for existing area sources that become major	Yes	Subpart WWWW of Part 63 clarifies compliance dates in §63.5800.
§63.6(d)	Reserved	No	
§63.6(e)(1) and (2)	Operation & maintenance requirements	Yes	
§63.6(e)(3)	Startup, shutdown, and malfunction plan and recordkeeping	Yes	Subpart WWWW of Part 63 requires a startup, shutdown, and malfunction plan only for sources using add-on controls.
§63.6(f)(1)	Compliance except during periods of startup, shutdown, and malfunction	No	Subpart WWWW of Part 63 requires compliance during periods of startup, shutdown, and malfunction, except startup, shutdown, and malfunctions for sources using add-on controls.
§63.6(f)(2) and (3)	Methods for determining compliance	Yes	
§63.6(g)(1) through (3)	Alternative standard	Yes	
§63.6(h)	Opacity and visible emission Standards	No	Subpart WWWW of Part 63 does not contain opacity or visible emission standards.
§63.6(i)(1) through (14)	Compliance extensions	Yes	

§63.6(i)(15)	Reserved	No	
§63.6(i)(16)	Compliance extensions	Yes	
§63.6(j)	Presidential compliance exemption	Yes	
§63.7(a)(1)	Applicability of performance testing requirements	Yes	
§63.7(a)(2)	Performance test dates	No	Subpart WWWW of Part 63 initial compliance requirements are in §63.5840.
§63.7(a)(3)	CAA Section 114 authority	Yes	
§63.7(b)(1)	Notification of performance test	Yes	
§63.7(b)(2)	Notification of rescheduled performance test	Yes	
§63.7(c)	Quality assurance program, including test plan	Yes	Except that the test plan must be submitted with the notification of the performance test.
§63.7(d)	Performance testing facilities	Yes	
§63.7(e)	Conditions for conducting performance tests	Yes	Performance test requirements are contained in §63.5850. Additional requirements for conducting performance tests for continuous lamination/casting are included in §63.5870.
§63.7(f)	Use of alternative test method	Yes	
§63.7(g)	Performance test data analysis, recordkeeping, and reporting	Yes	

§63.7(h)	Waiver of performance tests	Yes	
§63.8(a)(1) and (2)	Applicability of monitoring requirements	Yes	
§63.8(a)(3)	Reserved	No	
§63.8(a)(4)	Monitoring requirements when using flares	Yes	
§63.8(b)(1)	Conduct of monitoring exceptions	Yes	
§63.8(b)(2) and (3)	Multiple effluents and multiple monitoring systems	Yes	
§63.8(c)(1)	Compliance with CMS operation and maintenance requirements	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(c)(2) and (3)	Monitoring system installation	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(c)(4)	CMS requirements	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(c)(5)	Continuous Opacity Monitoring System (COMS) minimum procedures	No	Subpart WWWW of Part 63 does not contain opacity standards.
§63.8(c)(6) through (8)	CMS calibration and periods CMS is out of control	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.

§63.8(d)	CMS quality control program, including current test plan and all previous versions	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(e)(1)	Performance evaluation of CMS	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(e)(2)	Notification of performance evaluation	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(e)(3) and (4)	CMS requirements/ alternatives	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(e)(5) (i)	Reporting performance evaluation results	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(e)(5) (ii)	Results of COMS performance evaluation	No	Subpart WWWW of Part 63 does not contain opacity standards.
§63.8(f)(1) through (3)	Use of an alternative monitoring method	Yes	
§63.8(f)(4)	Request to use an alternative monitoring method	Yes	
§63.8(f)(5)	Approval of request to use an alternative monitoring method	Yes	
§63.8(f)(6)	Request for alternative to relative accuracy test and associated records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.

§63.8(g)(1) through (5)	Data reduction	Yes	
§63.9(a)(1) through (4)	Notification requirements and general information	Yes	
§63.9(b)(1)	Initial notification applicability	Yes	
§63.9(b)(2)	Notification for affected source with initial startup before effective date of standard	Yes	
§63.9(b)(3)	Reserved	No	
§63.9(b)(4)(i)	Notification for a new or reconstructed major affected source with initial startup after effective date for which an application for approval of construction or reconstruction is required	Yes	
§63.9(b)(4)(ii) through (iv)	Reserved	No	
§63.9(b)(4)(v)	Notification for a new or reconstructed major affected source with initial startup after effective date for which an application for approval of construction or reconstruction is required	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.

§63.9(b)(5)	Notification that you are subject to this subpart for new or reconstructed affected source with initial startup after effective date and for which an application for approval of construction or reconstruction is not required	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§63.9(c)	Request for compliance extension	Yes	
§63.9(d)	Notification of special compliance requirements for new source	Yes	
§63.9(e)	Notification of performance test	Yes	
§63.9(f)	Notification of opacity and visible emissions observations	No	Subpart WWWW of Part 63 does not contain opacity or visible emission standards.
§63.9(g)(1)	Additional notification requirements for sources using CMS	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.9(g)(2)	Notification of compliance with opacity emission standard	No	Subpart WWWW of Part 63 does not contain opacity emission standards.
§63.9(g)(3)	Notification that criterion to continue use of alternative to relative accuracy testing has been exceeded	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.9(h)(1) through (3)	Notification of compliance status	Yes	

§63.9(h)(4)	Reserved	No	
§63.9(h)(5) and (6)	Notification of compliance status	Yes	
§63.9(i)	Adjustment of submittal deadlines	Yes	
§63.9(j)	Change in information provided	Yes	
§63.10(a)	Applicability of recordkeeping and reporting	Yes	
§63.10(b)(1)	Records retention	Yes	
§63.10(b)(2)(i) through (v)	Records related to startup, shutdown, and malfunction	Yes	Only applies to facilities that use an add-on control device.
§63.10(b)(2)(vi) through (xi)	CMS records, data on performance tests, CMS performance evaluations, measurements necessary to determine conditions of performance tests, and performance evaluations	Yes	
§63.10(b)(2)(xii)	Record of waiver of recordkeeping and reporting	Yes	
§63.10(b)(2)(xiii)	Record for alternative to the relative accuracy test	Yes	
§63.10(b)(2)(xiv)	Records supporting initial notification and notification of compliance status	Yes	
§63.10(b)(3)	Records for applicability determinations	Yes	

§63.10(c)(1)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.10(c) (2) through (4)	Reserved	No	
§63.10(c) (5) through (8)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.10(c)(9)	Reserved	No	
§63.10(c) (10) through (15)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.10(d)(1)	General reporting requirements	Yes	
§63.10(d)(2)	Report of performance test results	Yes	
§63.10(d)(3)	Reporting results of opacity or visible emission observations	No	Subpart WWWW of Part 63 does not contain opacity or visible emission standards.
§63.10(d)(4)	Progress reports as part of extension of compliance	Yes	
§63.10(d)(5)	Startup, shutdown, and malfunction reports	Yes	Only applies if you use an add-on control device.
§63.10(e) (1) through (3)	Additional reporting requirements for CMS	Yes	This section applies if you have an add-on control device and elect to use a CEM to demonstrate continuous compliance with an emission limit.
§63.10(e)(4)	Reporting COMS data	No	Subpart WWWW of Part 63 does not contain opacity standards.

§63.10(f)	Waiver for recordkeeping or reporting	Yes	
§63.11	Control device requirements	Yes	Only applies if you elect to use a flare as a control device.
§63.12	State authority and delegations	Yes	
§63.13	Addresses of State air pollution control agencies and EPA Regional Offices	Yes	
§63.14	Incorporations by reference	Yes	
§63.15	Availability of information and confidentiality	Yes	

APPENDIX A TO SUBPART WWWW - TEST METHODS

VAPOR SUPPRESSANT EFFECTIVENESS TEST PROTOCOL

1. Scope and Application

1.1 Applicability. If a facility is using vapor suppressants to reduce hazardous air pollutant (HAP) emissions, the organic HAP emission factor equations in Table 1 to this subpart require that the vapor suppressant effectiveness factor be determined. The vapor suppressant effectiveness factor is then used as one of the inputs into the appropriate organic HAP emission factor equation. The vapor suppressant effectiveness factor test is not intended to quantify overall volatile emissions from a resin, nor to be used as a stand-alone test for emissions determination. This test is designed to evaluate the performance of film forming vapor suppressant resin additives. The results of this test are used only in combination with the organic HAP emissions factor equations in Table 1 to this subpart to generate emission factors.

1.1.1 The open molding process consists of application of resin and reinforcements to the mold surface, followed by a manual rollout process to consolidate the laminate, and the curing stage where the laminate surface is not disturbed. Emission studies have shown that approximately 50 percent to 55 percent of the emissions occur while the resin is being applied to the mold. Vapor suppressants have little effect during this portion of the lamination process, but can have a significant effect during the curing stage. Therefore, if a suppressant is 100 percent effective, the overall emissions from the process would be reduced by 45 percent to 50 percent, representing the emissions

generated during the curing stage. In actual practice, vapor suppressant effectiveness will be less than 100 percent and the test results determine the specific effectiveness in terms of the vapor suppressant effectiveness factor. This factor represents the effectiveness of a specific combination of suppressant additive and resin formulation.

1.1.2 A resin manufacturer may supply a molder with a vapor-suppressed resin, and employ this test to provide the molder with the vapor suppressant effectiveness factor for that combination of resin and vapor suppressant. The factor qualifies the effectiveness of the vapor suppressant when the resin is tested in the specific formulation supplied to the molder. The addition of fillers or other diluents by the molder may impact the effectiveness of the vapor suppressant. The formulation, including resin/glass ratio and filler content, used in the test should be similar to the formulation to be used in production. The premise of this method is to compare laminate samples made with vapor suppressant additive and made without the additive. The difference in emissions between the two yields the vapor suppressant effectiveness factor.

1.1.3 The method uses a mass balance determination to establish the relative loss of the volatile component from unsaturated polyester or vinyl ester resins, with and without vapor suppressant additives. The effectiveness of a specific vapor suppressant and resin mixture is determined by comparing the relative volatile weight losses from vapor suppressed and non-suppressed resins. The volatile species are not separately analyzed. While the species contained in the volatile component are not determined, an extended listing of potential monomer

that may be contained in unsaturated polyester or vinyl ester resins is provided in Table 1.1. However, most polyester and vinyl ester resin formulations presently used by the composites industry only contain styrene monomer.

Table 1.1 List of Monomers potentially present in unsaturated polyester/vinyl ester resins

Monomer	CAS Number
Styrene	100-42-5
Vinyl toluene	25013-15-4
Methyl methacrylate	80-62-6
Alpha methyl styrene	98-83-9
Para methyl styrene	Vinyl toluene isomer
Chlorostyrene	1331-28-8
Diallyl phthalate	131-17-9
Other volatile monomers	Various

2. Summary of Method

2.1 Differences in specific resin and suppressant additive chemistry affect the performance of a vapor suppressant. The purpose of this method is to quantify the effectiveness of a specific combination of vapor suppressant and unsaturated polyester or vinyl ester resin as they are to be used in production. This comparative test quantifies the loss of volatiles from a fiberglass reinforced laminate during the roll-out and curing emission phases, for resins formulated with and without a suppressant additive. A criterion for this method is the testing of a non-vapor suppressed resin system and testing the same resin with a vapor

suppressant. The two resins are as identical as possible with the exception of the addition of the suppressant to one. The exact formulation used for the test will be determined by the in-use production requirements. Each formulation of resin, glass, fillers, and additives is developed to meet particular customer and or performance specifications.

2.2 The result of this test is used as an input factor in the organic HAP emissions factor equations in Table 1 to this subpart, which allows these equations to predict emissions from a specific combination of resin and suppressant. This test does not provide an emission rate for the entire lamination process.

3. Definitions and Acronyms

3.1 Definitions

3.1.1 Vapor suppressant. An additive that inhibits the evaporation of volatile components in unsaturated polyester or vinyl ester resins.

3.1.2 Unsaturated polyester resin. A thermosetting resin commonly used in composites molding.

3.1.3 Unsaturated vinyl ester resin. A thermosetting resin used in composites molding for corrosion resistant and high performance applications.

3.1.4 Laminate. A combination of fiber reinforcement and a thermoset resin.

3.1.5 Chopped strand mat. Glass fiber reinforcement with random fiber orientation.

3.1.6 Initiator. A curing agent added to an unsaturated polyester or vinyl ester resin.

3.1.7 Resin application roller. A tool used to saturate and compact a wet laminate.

3.1.8 Gel time. The time from the addition of initiator to a resin to the state of resin gelation.

3.1.9 Filled resin system. A resin, which includes the addition of inert organic or inorganic materials to modify the resin properties, extend the volume and to lower the cost. Fillers include, but are not limited to; mineral particulates; microspheres; or organic particulates. This test is not intended to be used to determine the vapor suppressant effectiveness of a filler.

3.1.10 Material safety data sheet. Data supplied by the manufacturer of a chemical product, listing hazardous chemical components, safety precautions, and required personal protection equipment for a specific product.

3.1.11 Tare(ed). Reset a balance to zero after a container or object is placed on the balance; that is to subtract the weight of a container or object from the balance reading so as to weigh only the material placed in the container or on the object.

3.1.12 Percent glass. The specified glass fiber weight content in a laminate. It is usually determined by engineering requirements for the laminate.

3.2 Acronyms

3.2.1 VS - vapor suppressed or vapor suppressant

3.2.2 NVS - non-vapor suppressed

3.2.3 VSE - vapor suppressant effectiveness

3.2.4 VSE Factor - vapor suppressant effectiveness factor used in the

equations in Table 1 to this subpart

3.2.5 CSM - chopped strand mat

3.2.6 MSDS - material safety data sheet

4. Interferences

There are no identified interferences which affect the results of this test.

5. Safety

Standard laboratory safety procedures should be used when conducting this test. Refer to specific MSDS for handling precautions.

6. Equipment and Supplies

Note: Mention of trade names or specific products or suppliers does not constitute an endorsement by the Environmental Protection Agency.

6.1 Required Equipment

6.1.1 Balance enclosure[1]

6.1.2 Two (2) laboratory balances - accurate to ±0.01g[2]

6.1.3 Stop watch or balance data recording output to data logger with accuracy ±1 second[3]

6.1.4 Thermometer - accurate to ±2.0^{0}F(±1.0^{0}C)[4]

6.1.5 A lipped pan large enough to hold the cut glass without coming into contact with the vertical sides, e.g. a pizza pan[5]

6.1.6 Mylar film sufficient to cover the bottom of the pan[6]

6.1.7 Tape to keep the Mylar from shifting in the bottom of the pan.[7]

6.1.8 Plastic tri-corner beakers of equivalent - 250 ml to 400 ml capacity[8]

6.1.9 Eye dropper or pipette[9]

6.1.10 Disposable resin application roller, 3/16" - 3/4" diameter x 3" -6" roller length[10]

6.1.11 Hygrometer or psychrometer[11] accurate to ± 5percent

6.1.12 Insulating board, (Teflon, cardboard, foam board etc.) to prevent the balance from becoming a heat sink.[12]

6.2 Optional Equipment

6.2.1 Laboratory balance - accurate to ±.01g with digital output, such as an RS-232 bi-directional interface[13] for use with automatic data recording devices.

6.2.2 Computer with recording software configured to link to balance digital output. Must be programmed to record data at the minimum intervals required for manual data acquisition.

6.3 Supplies

6.3.1 Chopped strand mat - 1.5 oz/ft^2 [14]

7. Reagents and Standards

7.1 Initiator. The initiator type, brand, and concentration will be specified by resin manufacturer, or as required by production operation.

7.2 Polyester or vinyl ester resin

7.3 Vapor suppressant additive

8. Sample Collection, Preservation, and Storage

This test method involves the immediate recording of data during the roll out and curing phases of the lamination process during each test run. Samples are neither collected, preserved, nor stored.

9. Quality Control

Careful attention to the prescribed test procedure, routing equipment calibration, and replicate testing are the quality control activities for this test method. Refer to the procedures in Section 11. A minimum of six test runs of a resin system without a suppressant and six test runs of the same resin with a suppressant shall be performed for each resin and suppressant test combination.

10. Calibration and Standardization

10.1 The laboratory balances, stopwatch, hygrometer and thermometer shall be maintained in a state of calibration prior to testing and thereafter on a scheduled basis as determined by the testing laboratory. This shall be accomplished by using certified calibration standards.

10.2 Calibration records shall be maintained for a period of 3 years.

11. Test Procedure

11.1 Test Set-up

11.1.1 The laboratory balance is located in an enclosure to prevent fluctuations in balance readings due to localized air movement. The front of enclosure is open to permit work activity, but positioned so that local airflow will not effect balance readings. The ambient temperature is determined by suspending the thermometer at a point inside the enclosure.

11.1.2 The bottom of the aluminum pan is covered with the Mylar film. The film is held in position with tape or by friction between the pan and the film.

11.1.3 The resin and pan are brought to room temperature. This test temperature must be between 70^0F and 80^0F. The testing temperature cannot

vary more than ±2^{0}F during the measurement of test runs. Temperature shall be recorded at the same time weight is recorded on suppressed and non-suppressed test data sheets, shown in Table 17.1.

11.1.4 The relative humidity may not change more than ±15percent during the test runs. This is determined by recording the relative humidity in the vicinity of the test chamber at the beginning and end of an individual test run. This data is recorded on the test data sheets shown in Table 17.1.

11.1.5 Two plies of nominal 1.5 oz/ft^2 chopped strand mat (CSM) are cut into a square or rectangle with the minimum surface area of 60 square inches (i.e. a square with a side dimension of 7.75 inches).

11.1.6 The appropriate resin application roller is readily available.

11.2 Resin Gel Time/Initiator Percentage

11.2.1 Previous testing has indicated that resin gel time influences the emissions from composite production. The testing indicated that longer the gel times led to higher emissions. There are a number of factors that influence gel time including initiator type, initiator brand, initiator level, temperature and resin additives. Under actual usage conditions a molder will adjust the initiator to meet a gel time requirement. In this test procedure, the vapor suppressed and non-vapor suppressed resin systems will be adjusted to the same gel time by selecting the appropriate initiator level for each.

11.2.2 All test runs within a test will be processed in a manner that produces the same resin gel time ± 2 minutes. To facilitate the resin mixing procedure, master batches of resin and resin plus vapor suppressant of resin are prepared.

These resin master batches will have all of the required ingredients except initiator; this includes filler for filled systems. The gel times for the tests are conducted using the master batch and adjustments to meet gel time requirements shall be made to the master batch before emission testing is conducted. Test temperatures must be maintained within the required range, during gel time testing. Further gel time testing is not required after the non-vapor suppressed and vapor suppressed master batches are established with gel times within ± 2 minutes. A sufficient quantity of each resin should be prepared to allow for additional test specimens in the event one or more test fails to meet the data acceptance criteria discussed in Section 11.5 and shown in Table 17.2.

11.2.3 The specific brand of initiator and the nominal percentage level recommended by the resin manufacturer will be indicated on the resin certificate of analysis[15]; or, if a unique gel time is required in a production laminate, initiator brand and percentage will be determined by that specific requirement.

11.2.4 Examples

11.2.4.1 The resin for a test run is specified as having a 15-minute cup gel time at 77^{0}F using Brand X initiator at 1.5 percent by weight. The non-suppressed control resin has a 15-minute gel time. The suppressed resin has a gel time of 17-minutes. An initiator level of 1.5 percent would be selected for the both the non-suppressed and the suppressed test samples.

11.2.4.2 Based on a specific production requirement, a resin is processed in production using 2.25 percent of Brand Y initiator, which produces a 20-minute

gel time. This initiator at level of 2.25 percent produces a 20 minute gel time for the non-suppressed control resin, but yields a 25-minute gel time for the suppressed resin sample. The suppressed resin is retested at 2.50 percent initiator and produces a 21-minute gel time. The initiator levels of 2.25 percent and 2.50 percent respectively would yield gel times within ±2 minutes.

11.3 Test Run Procedure for Unfilled Resin (see the data sheet shown in Table 17.1).

11.3.1 The insulating board is placed on the balance.

11.3.2 The aluminum pan with attached Mylar film is placed on the balance, and the balance is tared (weight reading set to zero with the plate on the balance.)

11.3.3 Place two plies of 1.5 oz. CSM on the balance and record the weight (glass weight).

11.3.4 The resin beaker and stirring rod are put on the second balance and tared.

11.3.5 The required resin weight and initiator weight are calculated (refer to calculation formulas in 12.2).

11.3.6 The disposable resin application roller is placed on the edge of the plate.

11.3.7 The balance is tared, with the aluminum pan, Mylar film, glass mat, and resin application roller on the balance pan.

11.3.8 Resin is weighed into a beaker, as calculated, using the second balance. The mixing stick should be tared with the beaker weight.

11.3.9 Initiator is weighed into the resin, as calculated, using an eyedropper or a pipette, and the combination is mixed.

11.3.10 Initiated resin is poured on chopped strand mat in a pe-determined pattern (see Figure 11.6).

11.3.11 A stopwatch is started from zero.

11.3.12 The initial laminate weight is recorded.

11.3.13 The plate is removed from balance to enable roll-out of the laminate.

11.3.14 The wet laminate is rolled with the resin application roller to completely distribute the resin, saturate the chopped strand mat, and eliminate air voids. Roll-out time should be in the range of 2 to 3[16] minutes and vary less than ± 10 percent of the average time required for the complete set of six suppressed and six non-suppressed runs.

11.3.15 Record the rollout end time (time from start to completion of rollout).

11.3.16 Place the resin application roller on the edge of the plate when rollout is completed.

11.3.17 Place the plate back on the balance pan. Immediately record the weight.

11.3.18 For the first test in a series of six tests, weight is recorded every 5-minute interval (suppressed and non-suppressed). The end of the test occurs when three consecutive equal weights are recorded or a weight gain is observed (the last weight before the increased weight is the end of test weight). For the remaining five tests in the series, after the initial weights are taken, the next weight is recorded 30 minutes before the end of the test, as suggested by the

results from the first test. It is likely that the time to reach the end point of a suppressed resin test will be shorter than the time required to complete a non-suppressed test. Therefore, the time to start taking data manually may be different for suppressed and non-suppressed resins.

11.4 Test Run Procedures for Filled Resin Systems[17]

Note that the procedure for filled systems differs from the procedure for unfilled systems. With filled systems, resin is applied to one ply of the CSM and the second ply is placed on top of the resin.

11.4.1 The insulating board is placed on the balance.

11.4.2 The aluminum pan with attached Mylar film is placed on the balance, and the balance is tared (weight reading set to zero with the plate on the balance.)

11.4.3 Place two plies of 1.5 oz. CSM on the balance and record the weight (glass weight).

11.4.4 Remove the top ply of fiberglass and record its weight (weight of 1st layer of glass).

11.4.5 The required resin weight and initiator weight are calculated (refer to calculation formulas in 12.2). Calculate the weight of filled resin and initiator based on the 2 layers of fiberglass.

11.4.6 The resin beaker and stirring rod are put on the second balance and tared.

11.4.7 A disposable resin application roller is placed on the edge of the plate.

11.4.8 The balance is tared, with the aluminum pan, Mylar film, glass mat, and

resin application roller on the balance pan.

11.4.9 Resin is weighed into the beaker, as calculated, using the second balance. The mixing stick should be tared with the beaker weight.

11.4.10 Initiator is weighed into the resin, as calculated, using an eyedropper or a pipette, and the combination is mixed.

11.4.11 Initiated resin is poured on the single ply of CSM in a pre-determined pattern. Refer to Figure 11.6.

11.4.12 A stopwatch is started from zero.

11.4.13 Record the weight of the resin ans single ply of CSM (L_1). The initial laminate weight equals L_1 plus the weight of second glass layer.

11.4.14 Replace the second layer of fiberglass.

11.4.15 Remove the plate from the balance to allow roll-out of the laminate.

11.4.16 Roll the wet laminate with the resin application roller to completely distribute the resin, saturate the chopped strand mat, and eliminate air voids. Roll-out time should be in the range of 2 to 3[16] minutes and vary less than ± 10 percent of the average time required for the complete set of six suppressed and six non-suppressed runs.

11.4.17 Record the roll-out end time (time from start to completion of rollout).

11.4.18 Place the resin application roller on the edge of the plate when rollout is completed.

11.4.19 Place the plate back on the balance pan. The initial weight is recorded immediately.

11.4.20 For the first test run in a series of six, weight is recorded at every 5-

minute interval (suppressed and non-suppressed). The end of the test occurs when three consecutive equal weights are recorded or a weight gain is observed (the last weight before the increased weight is the end of test weight). For the remaining five tests in the series, after the initial weights are taken, the next weight is recorded 30 minutes before the end of the test, as suggested by the results from the first test. It is likely that the time to reach the end point of a suppressed resin test will be shorter than the time required to complete a non-suppressed test. Therefore, the time to start taking data manually may be different for suppressed and non-suppressed resins.

11.5 Data Acceptance Criteria

11.5.1 A test set is designed as twelve individual test runs using the same resin, initiator, and gel time, six of the test runs use the resin non-vapor suppressed and the other six use it vapor suppressed.

11.5.2 If a test run falls outside any of the time, temperature, weight or humidity variation requirements, it must be discarded and run again.

11.5.3 The laminate roll out time for each individual test run must vary less than ± 10 percent of the average time required for the complete set of six suppressed and six non-suppressed runs.

11.5.4 Test temperature for each test run must be maintained within $\pm 2^0$F and the average must be between 70^0 and 80^0 F. Refer to 11.1.3.

11.5.5 The difference in the amount of resin for each run must be within ±10 percent of the average weight for the complete set of six suppressed and six non-suppressed runs.

11.5.6 The relative humidity from each test run must be within ±15 percent of the average humidity for the complete set of six suppressed and six non-suppressed tests. Refer to 11.1.4

11.5.7 The glass content for each test set must be within ±10 percent of the average resin-to-/glass ratio for the complete set of six suppressed and six non-suppressed runs. Refer to 12.2).

11.5.8 The filler content for each test of a test set must be within ±5 percent of the average filler content for the complete set of six suppressed and six non-suppressed runs. Refer to 12.2.

11.6 Resin Application Pour Pattern

11.6.1 To facilitate the distribution of resin across the chopped strand mat, and to provide consistency from test to test, a uniform pour pattern should be used. A typical pour pattern is shown below:

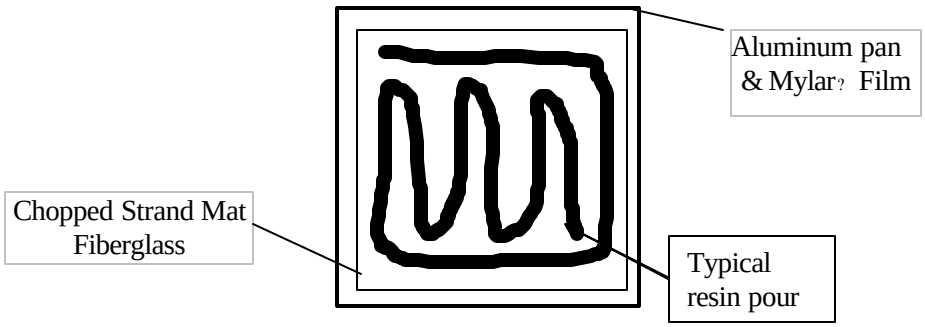

Figure 11.6 Resin Distribution Diagram

11.6.2 The resin is to be evenly distributed across the entire surface of the chopped strand mat using the resin application roller to achieve a wet look across the surface of the laminate. Pushing excess resin off the reinforcement and onto the Mylar sheet should be avoided. No resin is to be pushed more than ½ inch beyond the edge of the glass mat. If excess resin is pushed further from the glass mat, it will void the test run. As part of this process, typical visible air voids are to be eliminated by the rollout process. If the pour pattern is different from the above, it must be recorded and attached to test data sheet 17.1.

12. Data Analysis and Calculations

12.1 Data Analysis

This test method requires a simple mass balance calculation, no special data analysis is necessary.

12.2 Calculations

12.2.1 The target glass content (percent) for unfilled resin systems is determined from the specific production parameters being evaluated. In absence of any specific production requirements the target may be set at the tester's discretion.

12.2.2 Glass content determination (expressed as a per cent):

% Glass = Glass wt(g)/(Glass wt(g) + Resin weight (g))

12.2.3 Weight of resin required:

Resin weight required = (Glass wt (g)/% glass)-Glass wt (g)

12.2.4 Filled resin formulation determination for filled resin systems (e.g.>30 percent filler by weight for a particulate filler, or >1 percent by weight for a

lightweight filler, such as hollow microspheres):

% Resin content = resin weight(g)/(resin weight(g) + glass weight(g) + filler weight(g))

% Glass content = glass weight(g)/(resin weight(g) +glass weight(g) + filler weight(g))

Filler content = filler weight(g)/(resin weight(g) + glass weight(g) + filler weight(g))

12.2.5 Initiator weight determination:

Initiator weight (g) = Resin weight(g) x Initiator %

12.2.6 Emission weight loss determination:

Emissions weight loss(g) = Initial resin weight(g) - Final resin weight (g)

12.2.7 % Emission weight loss:

% Emission Weight Loss = (Emission weight loss(g) ÷ Initial resin weight(g) X 100

12.2.8 Average % Emission Weight Loss (assuming six test runs):

$$\text{Average \% Emission Weight Loss} = \sum_{i}^{N=6} (\text{\% Emission Weight Loss}_i)/6$$

12.2.9 VSE Factor calculation:

VSE Factor = 1 -(Average % VS Emission Weight Loss/Average NVS Emission Weight Loss)

Table 12.1 Example Calculation

Test #	% VS Weight Loss	% NVS Weight Loss
1	6.87	10.86
2	6.76	11.23
3	5.80	12.02
4	5.34	11.70
5	6.11	11.91
6	6.61	10.63
Average Weight Loss	6.25	11.39
	VSE Factor	0.4

VSE Factor = 0.45

VSE Factor is used as input into the appropriate equation in Table 1 to this subpart.

Example from Table 1 to this subpart:

Manual Resin Application, 35 percent HAP resin, VSE Factor of 0.45

HAP Emissions with vapor suppresants = ((0.286 x %HAP)-0.0529) x 2000 x (1-(0.5 x VSE factor))

HAP Emissions with vapor suppresants = ((0.286 x .35)-0.0529) x 2000 x (1-(0.5 x .45))

HAP Emissions with vapor suppresants = 73 pounds of HAP emissions per ton of resin.

13. Method Performance

13.1 Bias

The bias of this test method has not been determined.

13.2 Precision Testing

13.2.1 Subsequent to the initial development of this test protocol by the Composites Fabricators Association, a series of tests were conducted in three different laboratory facilities. The purpose of this round robin testing was to verify the precision of the test method in various laboratories. Each laboratory received a sample of an orthophthalic polyester resin from the same production batch, containing 48 per cent styrene by weight. Each testing site was also provided with the same vapor suppressant additive. The suppressant manufacturer specified the percentage level of suppressant additive. The resin manufacturer specified the type and level of initiator required to produce a 20 minute gel time. The target glass content was 30percent by weight.

13.2.2 Each laboratory independently conducted the VSE test according to this method. A summary of the results is included in Table 13.1.

TABLE 13.1 Round Robin Testing Results

	Test Lab 1		Test Lab 2		Test Lab 3	
	NVS	VS	NVS	VS	NVS	VS
Average percent WT Loss	4.24	1.15	4.69	1.84	5.73	1.61
Standard Deviation	0.095	0.060	0.002	0.002	0.020	0.003
VSE Factor		0.730		0.607		0.720

13.3 Comparison to EPA Reference Methods

This test has no corresponding EPA reference method.

14. Pollution Prevention

The sample size used in this method produces a negligible emission of HAP, and has an insignificant impact upon the atmosphere.

15. Waste Management

The spent and waste materials generated during this test are disposed according to required facility procedures, and waste management recommendations on the corresponding material safety data sheets.

16. References and footnotes

16.1 Footnotes

[1] Balance Enclosure - The purpose of the balance enclosure is to prevent localized airflow from adversely affecting the laboratory balance. The enclosure may be a simple three-sided box with a top and an open face. The configuration of the enclosure is secondary to the purpose of providing a stable and steady balance reading, free from the effects of airflow, for accurate measurements. The enclosure can be fabricated locally. A typical enclosure is shown in Figure 17.1.

[2] Laboratory Balance - Ohaus Precision Standard Series P/N TS400D or equivalent - Paul N. Gardner Co. 316 NE 1st St. Pompano Beach, FL 33060 or other suppliers.

[3] Stop Watch - Local supply.

[4] Thermometer - Mercury thermometer - ASTM No. 21C or equivalent; Digital thermometer - P/N TH-33033 or equivalent - Paul N. Gardner Co. 316 NE 1st St. Pompano Beach, FL 33060 or other suppliers.

[5] Aluminum Pan - Local supply.

[6] Mylar - Local supply.

[7] Double Sided Tape - 3M Double Stick Tape or equivalent, local supply.

[8] Laboratory Beakers - 250 to 400ml capacity - Local laboratory supply.

[9] Eye Dropper or Pipette - Local laboratory supply.

[10] Disposable Resin Application Roller Source - Wire Handle Roller P/N 205-050-300 or Plastic Handle Roller P/N 215-050-300 or equivalent; ES Manufacturing Inc., 2500 26st Ave. North, St. Petersburg, FL 33713, www.esmfg.com, or other source. Refer to Figure 17.3.

[11] Hygrometer or Psychrometer - Model# THWD-1, or equivalent - Part # 975765 by Amprobe Instrument, 630 Merrick Road, P.O. Box 329, Lynbrook, NY 11563 516-593-5600

[12] Insulating Board (Teflon, cardboard, foam board etc.) - Local supply.

[13] Laboratory Balance With Digital Output - Ohaus Precision Standard Series P/N TS120S or equivalent - Paul N. Gardner Co. 316 NE 1st St. Pompano Beach, FL 33060 or other suppliers.

[14] Chopped Strand Mat - 1.5 oz/ft^2 Sources: Owens Corning Fiberglas - Fiberglas M-723; PPG Industries - ABM HTX; Vetrotex America - M-127 or equivalent.

[15] Certificate of Analysis: Resin gel time, as recorded on the resin certificate of analysis, is measured using a laboratory standard gel time procedure. This procedure typically uses a 100 gram cup sample at 77^{0}F (25^{0}C), a specific type of initiator and a specified percentage.

[16] Roll-out times may vary with resin viscosity or resin additive. The important aspect of this step is to produce the same roll-out time for both the suppressed and non-suppressed samples.

[17] While this test can be used with filled resin systems, the test is not designed to determine the effect of the filler on emissions, but rather to measure the effect of the suppressant additive in the resin system. When evaluating a filled system both the non-vapor suppressed and vapor suppressed samples should be formulated with the same type and level of filler.

16.2 References

1. Phase 1 - Baseline Study Hand Lay-up, CFA, 1996

2. CFA Vapor Suppressant Effectiveness Test Development, 4/3/98, correspondence with Dr. Madeleine Strum, EPA, OAQPS

3. CFA Vapor Suppressant Effectiveness Screening Tests, 4/4/98

4. Styrene Suppressant Systems Study, Reichhold Chemical, 11/30/98

5. Evaluation of the CFA's New Proposed Vapor Suppressant Effectiveness Test, Technical Service Request #: ED-01-98, BYK Chemie, 6/3/98

6. Second Evaluation of the CFA's New Proposed Vapor Suppressant Effectiveness Test, Technical Service Request #: ED-02-98, BYK Chemie, 1/26/99

17. Data Sheets and Figures

17.1 This data sheet, or a similar data sheet, is used to record the test data for filled, unfilled, suppressed and non-suppressed tests. If additional time is required, the data sheet may be extended.

Table 17.1 Test Data Sheet

Test Number			Test Type		
			VS (_____)		NVS (____)
Resin			Filled (____)		Unfilled (___)
Initiator				Initiator, %	_____
Vapor Suppressant				VS, %	_____
Weight of 2 layers of glass, g	_____	Weight of 1st glass layer, g	_____	Weight of 2nd glass layer, g	_____

Initial Resin Weight,(g)		Time (Min.)	Weight g	Temp ^{0}F
Glass content, (%)		55		
Initial Temperature ^{0}F:		60		
Initial Humidity %		65		
Resin Initiator Level,%		70		
Resin gel time, (min.)		75		
Resin filler content, %		80		
Roll out time, (min.)		85		
Time, (min.)	Weight, g	Temp, ^{0}F	90		
Initial			95		
			100		
0			105		
5			110		
10			115		
15			120		
20			125		
25			130		

30			135		
35			140		
40			145		
45			150		
50			155		
Final Time, min.	Final Weight, g.		Final Temp, ^{0}F	Final Humidity, %	

17.2 Data Acceptance Criteria Worksheet

The following worksheet is used to determine the quality of collected data (i.e. insure the data collected all meets acceptance criteria)

Table 17.2. Data Acceptance Criteria Worksheet

Test No.	**Temperature**			**Laminate Roll Out Time, Min**	**Relative Humidity, %**		**Resin Weight, (g)**	**Glass Content, %**	**Resin Distribution**	**Meets Criteria Y/N**
	Min	**Max**	**Delta**		**Initial**	**Final**				
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										
Average										
Criteria			**± 2^0F**	**±10% of Average**	**± 15 of Average**		**± 10% of Avg.**	**± 10% of Avg.**	**<½ inch off mat**	**All Y**

17.3 VSE Factor Calculation

Table 17.3 Calculations Worksheet

Vapor Suppressed		Non-Vapor Suppressed	
Test #	% Weight Loss	Test #	% Weight Loss
Average Weight Loss			
VSE Factor			

VSE Factor = 1-(% Average Weight $Loss_{VS}$/ % Average Weight $Loss_{NVS}$)

17.4
Figures

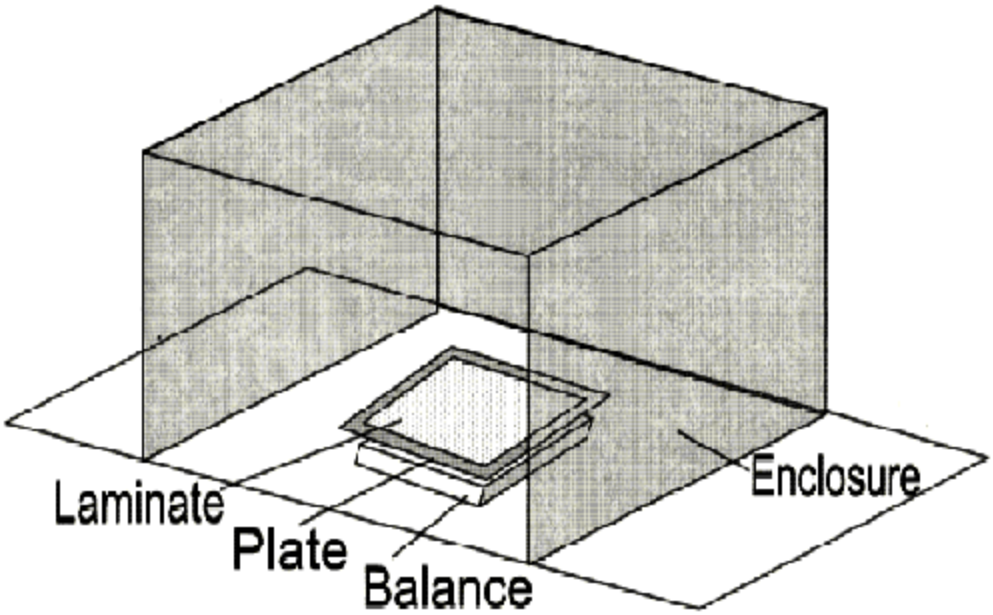

Figure 17.1 Typical Balance Enclosure

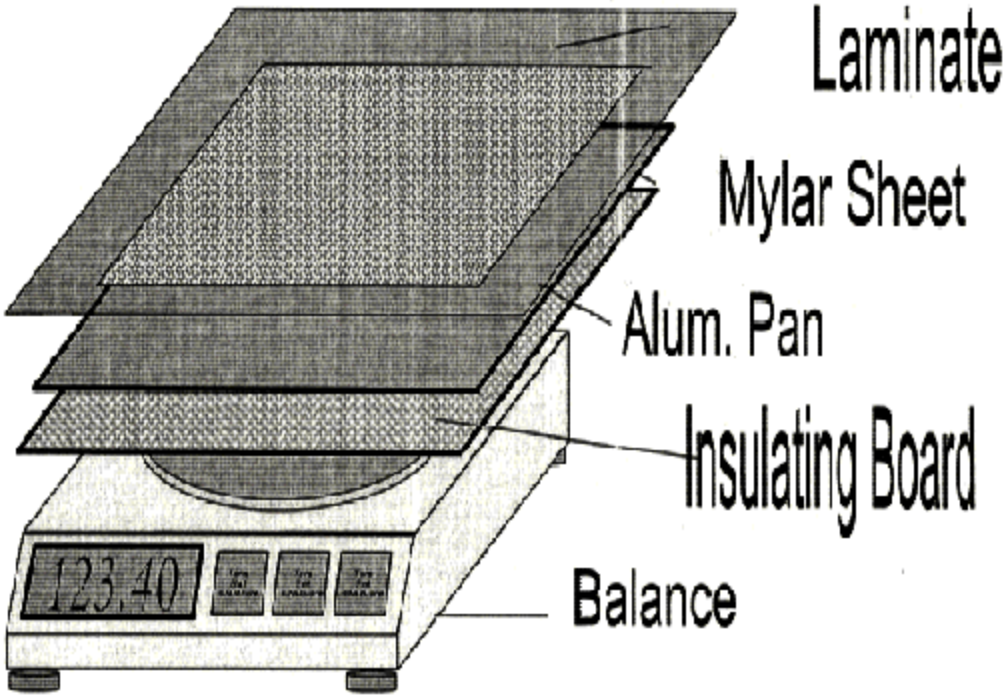

Figure 17.2 Scale, Plate, Insulating Board, Mylar, Laminate Order

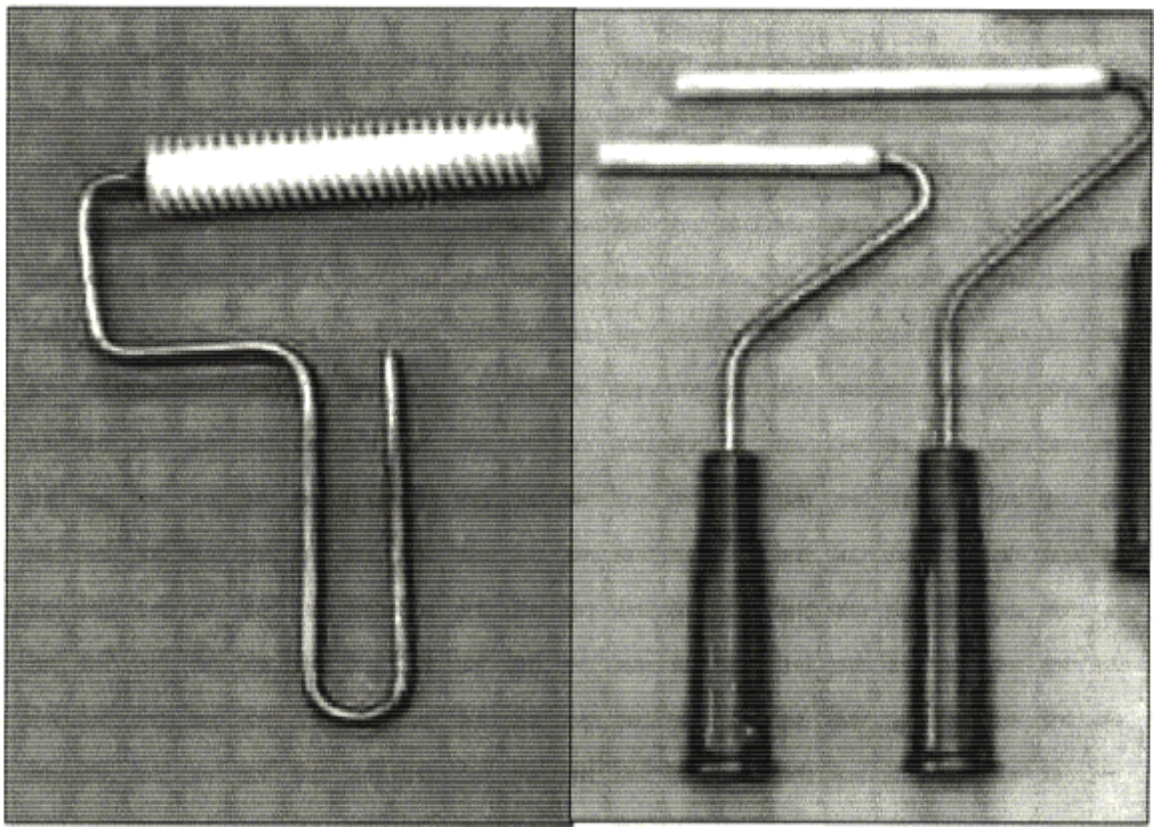

Figure 17.3 Typical FRP Rollers