

Statement of Basis For Title V Permit

Company Name	U.S. Fiberglass Products, Inc.	
Premise Number	1576001621	
Number of Non-insignificant Emissions Units	5	
What makes this facility a Title V facility?	The facility has potential styrene emissions of 38.0 TPY, which exceeds the Title V major source cutoff of less than or equal to 10 TPY of a single HAP. Styrene is a HAP.	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	

Instructions for Part II:

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

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
II.A.1	15-06		T&C - This facility is subject to OAC 3745-15-06, "Malfunction of equipment; scheduled maintenance; reporting"; as described in General Term and Condition A.2.
II.A.2	15-07	Y	T&C - This facility is subject to OAC 3745-15-07, "Air pollution Nuisances Prohibited"; as described in General Term and Condition A.20.
II.A.3.c Paragraph 1		Y	List of types of activities regulated under 40 CFR Part 63 Subpart WWWW (4W)
II.A.3.c Paragraph 2		Y	List of types of activities not regulated under Subpart WWWW
II.A.3.c Paragraph 3 and 4		Y	List of which agencies have authority to enforce under 4W
II.A.3.c Paragraph 5		Y	States where the definitions of terms are located in 4W

Part II (State and Federally Enforceable Requirements)

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
II.A.3.d Paragraph 1		Y	T&C - The permittee shall comply with the standards in the 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 (from 63.5800). The 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.d Paragraph 2		Y	T&C - 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). Facility specific date for compliance with 4W
II.A.3.d Paragraph 3 and 4		Y	T&C - 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 12-month rolling 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). Facility specific dates for compliance
II.A.3.d Paragraph 5		Y	T&C - 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)). Facility specific dates for compliance
II.A.3.e Paragraph 1		Y	T&C - The permittee shall be subject to Subpart WWWW of 40 CFR Part 63.
II.A.3.e Paragraph 2		Y	T&C - 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 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.e Paragraph 3		Y	T&C - The permittee shall meet the organic HAP emissions limits for open molding operations in Table 3 of the subpart (from 63.5805(a)). The 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.e Paragraph 4		Y	T&C - 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 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.e Paragraph 5		Y	T&C - The permittee shall meet the applicable work practice standards in Table 4 of this subpart (63.5805(a)). The 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.e Paragraph 6		Y	T&C - 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)). The 4W has adequate OR, M, R, Rp, and ET requirements.

Part II (State and Federally Enforceable Requirements)

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
II.A.3.e Paragraph 7		Y	T&C - 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)). The 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.e Paragraph 8 and 9		Y	T&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)). The 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.e Paragraph 10		Y	T&C - 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 12-month rolling 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)). The 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.e Paragraph 11		Y	T&C - 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 12-month rolling 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)). The 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.f Paragraph 1		Y	T&C - 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 1 of the subpart. (from 63.5810). The 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.f Paragraph 2		Y	T&C - 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 4W has adequate OR, M, R, Rp, and ET requirements.

Part II (State and Federally Enforceable Requirements)

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
II.A.3.f Paragraph 3		Y	T&C - 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 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.f Paragraph 4		Y	T&C - 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). The 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.f Paragraph 5		Y	T&C - 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)). The 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.g Paragraph 1		Y	T&C - The permittee shall keep the records listed in section 63.5915(a)(1) through (3) (from 63.5915(a)).The 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.g Paragraph 2		Y	T&C - 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 63.1915(c)). The 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.g Paragraph 3 and 4		Y	T&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)). The 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.g Paragraph 5		Y	T&C - 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)). The 4W has adequate OR, M, R, Rp, and ET requirements.

Part II (State and Federally Enforceable Requirements)

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
II.A.3.g Paragraph 6		Y	T&C - 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)). The 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.g Paragraph 7		Y	T&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)). The 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.g Paragraph 8		Y	T&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 12-month rolling average (from 63.5895(d)). The 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.g Paragraph 9		Y	T&C - 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)). The 4W has adequate OR, M, R, Rp, and ET requirements
II.A.3.h Paragraph 1		Y	T&C - 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)). The 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.h Paragraph 2		Y	T&C - 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)). The 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.h Paragraph 3		Y	T&C - 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). The 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.h Paragraph 4		Y	T&C - If the permittee's source is a new source subject to this subpart, the notifications specified in sections 63.9(b)(4) and (5) shall be submitted no later than the dates specified section 63.9(b)(4) and (5) (from Table 13) The 4W has adequate OR, M, R, Rp, and ET requirements.

Part II (State and Federally Enforceable Requirements)

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
II.A.3.h Paragraph 5		Y	T&C - If the permittee elects to meet the organic HAP emissions limit on a 12-month rolling 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 Section 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). Facility specific compliance date.
II.A.3.h Paragraph 6		Y	T&C - 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). Facility specific compliance date
II.A.3.h Paragraph 7		Y	T&C - 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 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.h Paragraph 8		Y	T&C - 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). The 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.h Paragraph 9		Y	T&C - The permittee shall submit each applicable report in Table 14 to the subpart. The 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.h Paragraph 10		Y	T&C - 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 section 63.999 (from 63.1905(h)). The 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.h Paragraph 11		Y	T&C - The permittee shall submit the compliance report required by Table 14, item 1 of the subpart semiannually according to the requirements in section 63.5910(b), and, the compliance report shall contain the information in 63.5910(c)(1) through (5) and from the following five paragraphs.(from Table 14 and 63.5910(c)). The 4W has adequate OR, M, R, Rp, and ET requirements.
II.A.3.h Paragraph 12		Y	T&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 4W has adequate OR, M, R, Rp, and ET requirements.

Part II (State and Federally Enforceable Requirements)

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
II.A.3.h Paragraph 13 and 14		Y	<p>T&C - The compliance report shall include information for the following three subjects (from Table 14).</p> <p>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 section 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.</p> <p>The 4W has adequate OR, M, R, Rp, and ET requirements.</p>
II.A.3.h Paragraph 15		Y	<p>T&C - Second, the information in section 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 section 63.8(c)(7), the report must contain the information in section 63.5910(e).</p> <p>The 4W has adequate OR, M, R, Rp, and ET requirements.</p>
II.A.3.h Paragraph 16		Y	<p>T&C - 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.</p> <p>The 4W has adequate OR, M, R, Rp, and ET requirements.</p>
II.A.3.h Paragraph 17		Y	<p>T&C - Unless the Administrator has approved a different schedule for submission of reports under section 63.10(a), the permittee shall submit each report by the date specified in paragraphs 63.5910(b)(1) through (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)).</p> <p>Facility specific compliance report</p>
II.A.3.h Paragraph 18		Y	<p>T&C - If the permittee's source qualifies for a compliance extension as specified in section 63.9(c), a request for a compliance extension as specified in 63.9(c) shall be submitted no later than the dates specified in section 63.6(i) (from Table 13).</p> <p>The 4W has adequate OR, M, R, Rp, and ET requirements.</p>
II.A.3.h Paragraph 19		Y	<p>T&C - In order to demonstrate continuous compliance with the applicable standards in 63.5805, the permittee shall report each deviation from each applicable standard according to the requirements in section 63.5910 (from 63.5900(b)).</p> <p>The 4W has adequate OR, M, R, Rp, and ET requirements.</p>

Part II (State and Federally Enforceable Requirements)

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
II.A.3.h Paragraph 20		Y	T&C - 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 70.6(a)(3)(iii)(A) or 71.6(a)(3)(iii)(A) and required by Ohio Administrative Code (OAC) 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 70.6(a)(3)(iii)(A) or 71.6(a)(3)(iii)(A) and (OAC) 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)). The 4W has adequate OR, M, R, Rp, and ET requirements. The state regulations requiring semi-annual deviation reports for Title V facilities was added to the 4w language.
II.A.3.i		Y	T&C - The permittee shall determine the organic HAP content of the resins and gel coats that are utilized in the facility in accordance with section 63.5797 of the subpart (from 63.5797). The 4W has adequate OR, M, R, Rp, and ET requirements.

Part III (Requirements Within the State and Federally Enforceable Section)

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other										
P004	not exceed 37.1 lbs Styrene/hr	N	Y	N	Y	Y	N	Y	Y	N	Y	N	31-05. All PTI T&Cs are not in the Title V. OR - CAM is not required for any EU at this facility. OR - The gel coat styrene content is limited and equipmer operates at its maximum capacity. M - The gel coat styrene content is monitored. ET - The VSE factor is required to be measured with the protocol required by 4W.
P004	not exceed 37.9 lbs VOC/hr.	N	Y	N	Y	Y	N	Y	Y	N	Y	N	31-05 OR - The gel coat styrene content and mold release agent use is limited and equipment operates at its maximum capacity. M - The gel coat styrene content is monitored. ET - The VSE factor is required to be measured with the protocol required by 4W.

Part III (Requirements Within the State and Federally Enforceable Section)

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other										
P004	not exceed 39.9 lbs OC/hr.	N	Y	N	Y	Y	N	Y	Y	N	Y	N	31-05 OR - The gel coat styrene content, mold release agent, and cleanup solvent use is limited and equipment operates at its maximum capacity. M - The gel coat styrene content is monitored. ET - The VSE factor is required to be measured with the protocol required by 4W.
P004	See Comments	N	Y	N	Y	Y	N	Y	Y	N	Y	N	L - 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. 31-05 OR - See the limit above. M - Gel coat use and gel coat styrene content is monitored ET - The VSE factor is required to be measured with the protocol required by 4W.
P004	See Comments	N	Y	N	Y	Y	N	Y	Y	N	Y	N	L - 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.) 31-05 OR - See the limit above. M - Gel coat use and gel coat styrene content is monitored ET - The VSE factor is required to be measured with the protocol required by 4W.

Part III (Requirements Within the State and Federally Enforceable Section)

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other										
P004	See Comments	N	Y	N	Y	Y	N	Y	Y	N	Y	N	L - 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.) 31-05 OR - See the limit above. M - Gel coat use and gel coat styrene content is monitored ET - The VSE factor is required to be measured with the protocol required by 4W.
P004	See Comments	N	Y	N	Y	Y	N	Y	Y	N	N	N	L - 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. 31-05 OR - The limitation is an OR. M - Mold release agent use is monitored.
P004	See Comments	N	Y	N	Y	Y	N	Y	Y	N	N	N	L - 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. 31-05 OR - The limitation is an OR. M - Mold release agent and cleanup material use is monitored.
P004	See Comments	21-07(G)	N	Y	N	N	N	N	N	N	N	N	L - 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). ND - 3745-21-07(G) does not apply. M - There is no req't so no M is needed. R - There is no req't so no R is needed. Rp - There is no req't so no Rp is needed.

Part III (Requirements Within the State and Federally Enforceable Section)

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other										
P004	See Comments	N	Y	N	N	Y	N	Y	Y	N	N	N	L - 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: (See the permit for the multiple required notifications) MACT 4W M - the subjects of the notifications are monitored under 4W.
P005, 6, 7, and 8	not exceed 22.2 lbs Styrene/hr.	N	Y	N	Y	Y	N	Y	Y	N	Y	N	31-05 OR - The resin styrene content is limited and equipment operates at its maximum capacity. M - The resin styrene content is monitored ET - The VSE factor is required to be measured with the protocol required by 4W.
P005, 6, 7, and 8	not exceed 23.9 lbs VOC/hr.	N	Y	N	Y	Y	N	Y	Y	N	Y	N	31-05 OR - The resin styrene content is limited and equipment operates at its maximum capacity. M - The resin styrene content is monitored ET - The VSE factor is required to be measured with the protocol required by 4W.
P005, 6, 7, and 8	not exceed 27.9 lbs OC/hr.	N	Y	N	Y	Y	N	Y	Y	N	Y	N	31-05 OR - The resin styrene content and mold release agent use is limited. M - The resin styrene content and mold release agent use is monitored. ET - The VSE factor is required to be measured with the protocol required by 4W.
P005, 6, 7, and 8	not exceed 16.61 tons Styrene/yr.	N	Y	N	Y	Y	N	Y	Y	N	Y	N	31-05 OR - The resin styrene content, mold release agent, and cleanup solvent use is limited. M - The resin styrene content, mold release agent, and cleanup solvent use is monitored. ET - The VSE factor is required to be measured with the protocol required by 4W.

Part III (Requirements Within the State and Federally Enforceable Section)

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other										
P005, 6, 7, and 8	not exceed 19.11 tons VOC/yr.	N	Y	N	Y	Y	N	Y	Y	N	Y	N	31-05 OR - The resin styrene content and mold release agent use is limited. M - The resin styrene content and mold release agent use is monitored. ET - The VSE factor is required to be measured with the protocol required by 4W.
P005, 6, 7, and 8	not exceed 25.11 tons OC/yr.	N	Y	N	N	Y	N	Y	Y	N	Y	N	31-05 OR - The resin styrene content, mold release agent, and cleanup solvent use is limited. M - The resin styrene content, mold release agent, and cleanup solvent use is monitored. ET - The VSE factor is required to be measured with the protocol required by 4W.
P005, 6, 7, and 8	See Comments	N	Y	N	Y	Y	N	Y	Y	N	Y	N	L - The combined styrene emissions from emissions unit: P005 and P006 shall not exceed 16.61 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. 31-05 OR - See the limit above. M - The resin use and resin styrene content is monitored. ET - The VSE factor is required to be measured with the protocol required by 4W.
P005, 6, 7, and 8	See Comments	N	Y	N	Y	Y	N	Y	Y	N	Y	N	L - The combined VOC emissions from emissions units P005 and P006 shall not exceed 16.61 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.) 31-05 OR - See the limit above. M - The resin use and resin styrene content is monitored. ET - The VSE factor is required to be measured with the protocol required by 4W.