State of Ohio Environmental Protection Agency

STREET ADDRESS:
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Columbus, Ohio 43215

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

10/14/2008

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR
No	CEMS
Yes	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Debra Kaelin
TPI Composites LLC Springfield Operations
2145 Airpark Drive
Springfield, OH 45502-7931

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0812760583
Permit Number: P0103688
Permit Type: OAC Chapter 3745-31 Modification
County: Clark

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Springfield Daily News. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.state.oh.us/dapc in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA
RAPCA; Indiana

Clark County

PUBLIC NOTICE
Issuance Of Draft Air Pollution Permit-To-Install
TPI Composites LLC Springfield Operations

Issue Date: 10/14/2008
Permit Number: P0103688
Permit Type: OAC Chapter 3745-31 Modification
Permit Description: Chapter 31 modification replacing PTI 08-04853 issued 10/30/07 to split P001, P002 and P003 into multiple emissions units.
Facility ID: 0812760583
Facility Location: TPI Composites LLC Springfield Operations
2145 Airpark Drive,
Springfield, OH 45502-7931
Facility Description: Laminated Plastics Plate, Sheet (except Packaging), and Shape Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Stephanie Madden at Regional Air Pollution Control Agency, 117 South Main Street or (937)225-4435. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc

Permit Strategy Write-Up

1. Check all that apply:

_X_ Synthetic Minor Determination

___ Netting Determination

2. Source Description:

TPI Composites, LLC, SIC 3083, is a reinforced fiberglass composites manufacturing facility located in Springfield, Ohio, Clark County which is in attainment for all criteria pollutants except PM 2.5. TPI typically manufacturers large products in a patented process called "SCRIMP" that minimizes VOC (styrene) releases from the manufacturing process (Emissions units P001-P003 and P006 - P010). TPI also has the capability to do some open molding of fiberglass composite products (Emissions unit P004). The other emissions units at TPI consist of a composite repair operation (P005), gelcoat application (R001 and R003), and plastic parts painting (R002). The facility will be a minor source with respect to prevention of significant deterioration thresholds. However, due to the materials and operations that will be used, the potential to emit for hazardous air pollutants (HAPs) and volatile organic compounds (VOCs), the facility will be Title V and subject to two National Emission Standards for Hazardous Air Pollutants: 40 CFR 63, Subaprt WWWW - Reinforced Plastic Composites Production and 40 CFR 63, Subpart PPPP - Surface Coating of Plastic Parts and Products.

3. Facility Emissions and Attainment Status:

When PTI 08-04750 was issued, Clark County was non-attainment for ozone and PM 2.5. Since that time Clark County has been redesignated as ozone attainment. At this time TPI wishes to increase the facility wide synthetic minor limitation of 86.34 tons VOC per rolling, 12 month. The permitted allowables for all emissions units combined will be 155.60 TPY VOC with the facility wide, including de minimis and PTI exempt sources being 168.83 TPY VOC. This modification does not meet the definition of major modification in OAC 3745-31-01, because it is not a major stationary source as defined in OAC 3745-31-01; therefore, they can do a modification up to 250 tons without triggering PSD. Retaining the synthetic minor limitation ensures that when the OAC 3745-21-07 SIP revision gets approved by Region V US EPA, TPI will not need to recalculate their PTE, therefore, they will not be defined as a major stationary source.

Emissions from the facility will be largely comprised of VOCs associated with resin molding, gel coating operations and spray painting. TPI is requesting a federally enforceable emissions limitation of 155.60 tons per rolling, 12-month to stay out of prevention of significant deterioration (PSD). Coating operations also generate 1.33 tons/year of particulate emissions. The facility will emit other criteria pollutants from the combustion of natural gas in facility heating systems; however, this equipment is all rated at less than 10 mmBtu/hr heat input and therefore, falls under the permitting exemption of 3745-31-03(A)(1)(a). Although these units are de minimis, the emissions are accounted for in the facility wide total of 168.83 TPY. The following sources contribute to TPI's facility wide VOC emissions:

OEPA ID	Description	Allowable VOC Emissions		
		lb/hr	lb/day	tons/yr
P001	Closed Molding Set A	8.0	40.0	19.19
P002	Closed Molding Set B	8.0	40.0	
P003	Closed Molding Set C	8.0	40.0	
P006	Closed Molding Set D	8.0	40.0	
P007	Closed Molding Set E	8.0	40.0	
P008	Closed Molding Set F	8.0	40.0	
P009	Closed Molding Set G	8.0	40.0	
P010	Closed Molding Set H	8.0	40.0	
P004	Open Molding	3.91	93.73	15.35
P005	Repair	1.17	28.05	4.67
R001	Gelcoat Application	8.86	148.24	38.79
R002	Painting/Priming Application	10.07	154.43	38.81
R003	Gelcoat Application	8.86	148.24	38.79
	Rolling 12-month, synthetic minor VOC emissions limit:			**155.60**
De Minimis	Storage Tanks	---	---	0.01
De Minimis	Assembly	---	---	0.44
PTI Exempt	(7) 0.13 mmBtu/hr gas fired unit heaters	---	---	0.021
PTI Exempt	(3) 0.12 mmBtu/hr horizontal gas furnaces	---	---	0.0083
PTI Exempt	(5) 0.08 mmBtu/hr horizontal gas furnaces	---	---	0.0092
PTI Exempt	Lab Area	---	---	0.18
PTI Exempt	1.6 mmBtu/hr batch oven	---	---	0.037
PTI Exempt	1.5 mmBtu/hr hot water furnace/boiler	---	---	0.035
PTI Exempt	(2) 1.21 mmBtu/hr air make-up units (gelcoat)	---	---	0.056
De Minimis	2K adhesive pump (adhesive station)	---	---	0.51
De Minimis	Ubiquitous adhesive stations (aerosol cans)	---	---	11.93
			Facility Total:	**168.83**

4. Source Emissions:

The source-specific VOC emissions are included in the Table above.

5. Conclusion:

The terms and conditions in this Synthetic Minor PTI will limit the facility to less than 250 tons VOC per year and avoid being classified as a major stationary source as defined in OAC rule 3745-31-01(KKK). Potential emissions have been limited through taking federally enforceable limitations on the amount of volatile organic material used in emissions units P001 - P010 and R001 - R003 and through the inclusion of appropriate monitoring, record keeping and reporting requirements for these emissions units.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
VOC	155.6

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

Air Pollution Permit-to-Install
for
TPI Composites LLC Springfield Operations

Facility ID: 0812760583
Permit Number: P0103688
Permit Type: OAC Chapter 3745-31 Modification
Issued: 10/14/2008
Effective: To be entered upon final issuance

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install
for
TPI Composites LLC Springfield Operations

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Authorization

Facility ID: 0812760583
Facility Description: laminated plastics plate and sheet
Application Number(s): A0007635
Permit Number: P0103688
Permit Description: Chapter 31 modification replacing PTI 08-04853 issued 10/30/07 to split P001, P002 and P003 into multiple emissions units.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $800.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 10/14/2008
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

TPI Composites LLC Springfield Operations
2145 Airpark Drive
Springfield, OH 45502-7931

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0103688
Permit Description: Chapter 31 modification replacing PTI 08-04853 issued 10/30/07 to split P001, P002 and P003 into multiple emissions units.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**R001**
Company Equipment ID:	Gelcoat
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: (Existing) Closed Molding Sets

Emissions Unit ID:	**P001**
Company Equipment ID:	Closed Molding Op 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	Closed Molding Op 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P003**
Company Equipment ID:	Closed Molding Op 3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

(1) Standard Term and Condition A. 2.a), Severability Clause

(2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements

(3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A. 9., Reporting Requirements

(5) Standard Term and Condition A. 10., Applicability

(6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A. 14., Public Disclosure

(8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A. 16., Fees

(10) Standard Term and Condition A. 17., Permit Transfers

2. Severability Clause

a) 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.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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 re-issuance, or modification.

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, revoked, or revoked and reissued, for cause. 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 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.

4. 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, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

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

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, 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.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Regional Air Pollution Control Agency.

(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Regional Air Pollution Control Agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Regional Air Pollution Control Agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. 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 are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. 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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Regional Air Pollution Control Agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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.

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

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

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

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

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

d) The permittee shall submit progress reports to the Regional Air Pollution Control Agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

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

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

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Regional Air Pollution Control Agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Regional Air Pollution Control Agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e.,

postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.

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

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Regional Air Pollution Control Agency must be notified in writing of any transfer of this permit.

18. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

19. 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.

B. Facility-Wide Terms and Conditions

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

   a) None.

2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart WWWW: P001, P002, P003 and R001. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate EPA District Office or local air agency.

C. Emissions Unit Terms and Conditions

1. R001, Gelcoat

Operations, Property and/or Equipment Description:

Gelcoat Application

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 8.86 pounds per hour (lbs/hr) and 38.79 tons per year (TPY) excluding cleanup. The particulate emissions (PE) from this emissions unit shall not exceed 0.11 lb/hr and 0.47 TPY. Compliance with this rule also includes compliance with OAC rules 3745-21-07, 3745-17-07(A), 3745-17-11(B), 3745-31-05(D), and 40 CFR Part 63, Subparts A and WWWW.
b.	OAC rule 3745-21-07(G)(9)(g) OAC rule 3745-21-07(M)(5)(e)	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 less stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-21-07(M)(2). See b)(2)c.
c.	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.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(B)	The requirements specified by these rules are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-31-05(D) (Synthetic minor to avoid being classified as a major stationary source per OAC rule 3745-31-01(KKK))	The combined VOC emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, R001, R002, and R003 shall not exceed 155.60 tons per rolling, 12-month period.
f.	40 CFR 63.1-15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
g.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	The maximum pounds of HAP per ton of resin for this emissions unit shall not exceed 377 lbs/ton. [40 CFR 63.5805(c)]

(2) Additional Terms and Conditions

a. The 8.86 lbs/hr VOC was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

b. The 0.11 lb/hr and 0.47 TPY PE were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.

c. The requirements established under OAC rule 3745-21-07 shall cease to be effective and federally enforceable on the date the U.S. EPA approves the current rule as a revision to the Ohio SIP for the control of organic compounds.

c) Operational Restrictions

(1) The permittee shall not employ any cleanup material in this emissions unit that contains a volatile organic compound (VOC) as defined in OAC rule 3745-21-01(B)(6).

(2) The permittee shall operate and maintain a dry filtration system to control PE from this emissions unit.

(3) The maximum annual volatile organic material usage rate for emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, R001, R002, and R003 shall not exceed 155.60 tons per year, based upon a rolling, 12-month summation of the monthly volatile organic material usage calculations. The volatile organic material usage rate in this term equates to the annual VOC emissions rate in term b)(1)a. and is the fraction of the VOC content that is not consumed in the molding and coating processes and released without control to the ambient air from resin, promoter, catalyst and coating use

in the emissions units listed. This correlation is based upon the premise that all the record keeping and reporting requirements of this permit for the VOC emissions will be sufficient to verify the annual volatile organic material usage rate of this term.

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

63.5805(c) Work practice standards in Table 4.

d) Monitoring and/or Recordkeeping Requirements

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

a. The name and identification of each material employed.

b. The volume, in pounds, of each material employed.

c. The VOC* content for each material employed, in percent by weight.

d. The total VOC emissions rate from each material employed, in lbs/month {the summation of [d)(1)b] x the appropriate emission factor equation from Table 1 to Subpart WWWW; (0.445 x [d)(1)c] / 100) for VOC contents less than 33% or (1.03646 x ([d)(1)c] / 100) - 0.195) for all other VOC contents}.

e. The total combined VOC emissions rate from all materials employed, in lbs/month {the sum of [d)(1)d] for all materials employed}.

f. The rolling, 12-month summation of the volatile organic material usage, in pounds {the summation of [d)(1)e] for the previous 12-month period}.

g. The rolling, 12-month summation of the VOC emissions from this emissions unit, in tons {[d)(1)f] divided by 2,000 lbs/ton}.

* For the materials employed, the total VOC content equals the total organic HAP content.

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

a. The name and identification of each material employed.

b. The organic HAP for each material employed, in percent by weight.

c. The organic HAP for each material employed, in lb of HAP per ton of gelcoat employed. {i.e., using equation 1.f. from Table 1 to Subpart WWWW where lb HAP / ton gelcoat equals (0.445 x [d)(1)c] / 100 x 2000) for OHAP contents less than 33% or ((1.03646 x ([d)(1)c] / 100) - 0.195) x 2000) for all other OHAP contents}.

(3) 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.

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

63.5810	Demonstrate compliance with the Organic HAP emissions limits in Table 3 using one of the methods in 63.5810(a) through (d) and Table 1.
63.5860(a)	Initial compliance demonstration using the procedures in Tables 8 and 9 of subpart WWWW.
63.5895(c) and (d)	Collect and record resin usage, 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 Table 3.
63.5900(a)	Records of Organic HAP emissions factor and Organic HAP content value.
63.5915	Records that must be maintained.

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing identifying each day during which any cleanup material other than acetone was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

(2) The permittee shall submit annual reports which specify the VOC emissions rate, in tons, from this emissions unit, as well as, the total VOC emissions rate, in tons, from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, R001, R002, and R003. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

This reporting requirement may be satisfied by including and identifying the specific emissions data from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, R001, R002, and R003 in the annual fee emissions report.

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

a. An identification of each month during which the rolling, 12-month volatile organic material usage and/or VOC emissions from P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, R001, R002, and R003 exceeded the 155.60 TPY rolling, 12-month volatile organic material usage and/or VOC emission limitations, and the actual rolling, 12-month volatile organic material usage and/or VOC emission rates for each such month.

b. An identification of each noncomplying coating employed in this emissions unit and the actual weight percent of organic HAP, as applied, and the actual pounds of HAP per ton of resin for this emissions unit.

The quarterly deviation reports shall be submitted by January 15, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

(4) The permittee shall notify the Director (the appropriate Ohio EPA District Office or 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 Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event.

(5) The permittee shall submit a notification of the actual date of startup of the emissions unit to the Director (the appropriate Ohio EPA District Office or local air agency) within 15 days following the startup date of the affected source.

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

63.5860(a)	Initital Compliance demonstration using the procedures in Table 9 to subpart WWWW.
63.5905	Submit all notifications in Table 13 to subpart WWWW that apply. Any changes must be submitted within 15 calendar days.
63.5910	Submit each report in Table 14 to subpart WWWW that applies, by the date specified in Table 14 and according to paragraphs (b)(1) through (b)(5) of 40 CFR 63.5910.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>

The VOC emissions from this emissions unit shall not exceed 8.86 lbs/hr.

<u>Applicable Compliance Method</u>

Compliance with the hourly VOC emission limitation shall be determined by multiplying the maximum hourly usage rate of VOC containing materials by the emission factor equation in Table 1 to Subpart WWWW for the highest organic HAP content of 37% by weight (for the materials employed, the total organic HAP content equals the total VOC).

b. <u>Emission Limitation</u>

The VOC emissions from this emissions unit shall not exceed 38.79 TPY.

<u>Applicable Compliance Method</u>

Compliance with the annual limitation shall be based upon the record keeping in d)(1) of this permit and shall be the summation of the 12 monthly VOC emission rates for the calendar year.

c. Emission Limitation

The combined VOC emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, R001, R002, and R003 shall not exceed 155.60 tons VOC per rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

d. Emission Limitation

The PE from this emissions unit shall not exceed 0.11 lb/hr and 0.47 TPY.

Applicable Compliance Method

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

e. 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).

f. Emission Limitation

The maximum pounds of HAP per ton of resin for this emissions unit shall not exceed 377 lbs/ton.

Applicable Compliance

Compliance shall be based upon the record keeping requirements specified in d)(2) of this permit.

g) Miscellaneous Requirements

(1) The terms and conditions listed in this permit to install shall supercede all the terms and conditions for this emissions unit contained in permit to install 08-04853 as issued on October 30, 2007.

2. Emissions Unit Group - (Existing) Closed Molding Sets: P001, P002, P003,

EU ID	Operations, Property and/or Equipment Description
P001	Closed Molding Operation No. 1
P002	Closed Molding Operation No. 2
P003	Closed Molding Operation No. 3

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The combined Volatile Organic Compound (VOC) emissions from emissions units P001, P002, P003, P006, P007, P008, P009, and P010 shall not exceed 1.60 tons per month (TPM) and 19.19 tons per year (TPY). The requirements of this rule also includes compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-31-05(D).
b.	OAC rule 3745-21-07(G)(2)	Each day that a photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all materials, including cleanup, shall not exceed 8 pounds per hour and 40 pounds per day. OC emissions from cleanup material that is not a photochemically reactive material shall not be included in showing compliance with these emission limitations. See b)(2)b.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid being classified as a major stationary source per OAC rule 3745-31-	The combined VOC emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, R001, R002, and R003 shall not exceed

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	01(KKK))	155.60 tons per rolling, 12-month period.
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	See b)(2)a.

(2) Additional Terms and Conditions

a. In accordance with 40 CFR 63.5790(b), this emissions unit is a closed molding process that is part of a new affected source; however, it is specifically excluded from any requirements of 40 CFR Part 63, Subpart WWWW per 40 CFR 63.5790(c). This closed molding process does not meet the definition of compression/injection molding per 40 CFR 63.5935.

b. The OC emission limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in sections d)(1), e)(1), f)(1)a and f)(1)b shall be void.

c) Operational Restrictions

(1) The maximum annual volatile organic material usage rate for emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, R001, R002, and R003 shall not exceed 155.60 tons per year, based upon a rolling, 12-month summation of the monthly volatile organic material usage calculations. The volatile organic material usage rate in this term equates to the annual VOC emissions rate in term b)(1)a and is the fraction of the VOC content that is not consumed in the molding and coating processes and released without control to the ambient air from resin, promoter, catalyst, coating and cleanup use in the emissions units listed. This correlation is based upon the premise that all the record keeping and reporting requirements of this permit for the VOC emissions will be sufficient to verify the annual organic material usage rate of this term.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each day that photochemically reactive materials are employed in this emissions unit:

a. The company identification for each resin, promoter, catalyst and photochemically reactive cleanup material employed.

b. The number of gallons of each resin, promoter, catalyst and photochemically reactive cleanup material employed.

c. The organic compound content of each resin, promoter, catalyst and photochemically reactive cleanup material, in percent by weight.

d. The total organic compound emission rate for all resin, promoter, catalyst and photochemically reactive cleanup materials, in pounds per day {the summation of

[d)(1)b] x ([d)(1)c]/100) x (the appropriate emission factor for each individual VOC)}.

i. A 0.5% evaporation loss of styrene from the resin employed is the worst case emission factor for closed molding, based on facility specific testing of the SCRIMP process.

ii. A 100% evaporation loss of all OCs from the promoter and cleanup employed is the assumed worst case emission factor.

iii. A 0.04% evaporation loss of dimethyl phthalate and 100% evaporation loss of all other OCs except for peroxides from the catalyst employed are the worst case emissions factors, based on a 1999 study conducted on "Emission Factors for Liquid Organic Peroxide Catalysts".

e. The total number of hours the emissions unit was in operation.

f. The average hourly organic compound emission rate for all resin, promoter, catalyst and photochemically reactive cleanup materials, i.e., [d)(1)d]/[d)(1)e], in pounds per hour (average).

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the SIP, d)(1) will be voided entirely.].

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

a. The name and identification of each material employed, including cleanup.

b. The volume, in pounds, of each material employed, including cleanup.

c. The individual VOC content for each VOC in each material employed, in percent by weight.

d. The total individual VOC emissions rate from each material employed, in lbs/month {the summation of [d)(2)b] x ([d)(2)c]/100) x (the appropriate emission factor for each individual VOC)}.

i. A 0.5% evaporation loss of styrene from the resin employed is the worst case emission factor for closed molding, based on facility specific testing of the SCRIMP process.

ii. A 100% evaporation loss of all VOCs from the promoter and cleanup employed is the assumed worst case emission factor.

iii. A 0.04% evaporation loss of dimethyl phthalate and 100% evaporation loss of all other VOCs except for peroxides from the catalyst employed are the worst case emissions factors, based on a 1999 study conducted on "Emission Factors for Liquid Organic Peroxide Catalysts".

e. The total combined VOC emissions rate from all VOCs employed, in tons/month {the summation of [d)(2)d] / 2,000 lbs/ton}.

f. The rolling, 12-month summation of the volatile organic material usage, in pounds {the summation of [d)(2)b] for the previous 12-month period}.

g. The rolling, 12-month summation of the VOC emissions from this emissions unit, in tons, i.e., the summation of [d)(2)e] for the previous 12-month period.

e) Reporting Requirements

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

a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.

b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The notification shall include a copy of such record and shall be sent to the appropriate Ohio EPA District Office or local air agency within 45 days after the exceedance occurs.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the SIP, e)(1) shall be voided.]

(2) The permittee shall submit annual reports which specify the VOC emissions rate, in tons, from this emissions unit, as well as, the total VOC emissions rate, in tons, from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, R001, R002, and R003. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

This reporting requirement may be satisfied by including and identifying the specific emissions data from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, R001, R002, and R003 in the annual fee emissions report.

(3) The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month volatile organic material usage and/or VOC emissions from P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, R001, R002, and R003 exceeded the 155.60 TPY rolling, 12-month volatile organic material usage and/or VOC emission limitations, and the actual rolling, 12-month volatile organic material usage and/or VOC emission rates for each such month.

These quarterly deviation reports shall be submitted to the appropriate Ohio EPA District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter.

f) Testing Requirements

(1) Compliance with the emission limitations specified in b)(1) shall be determined by the following methods:

a. Emission Limitation

The OC emissions from this emissions unit shall not exceed 8 lbs/hr for each day that photochemically reactive materials are employed.

Applicable Compliance Method

Compliance shall be determined according to the record keeping requirements of d)(1) of this permit.

b. Emission Limitation

The OC emissions from this emissions unit shall not exceed 40 lbs/day for each day that photochemically reactive materials are employed.

Applicable Compliance Method

Compliance shall be determined according to the record keeping requirements of d)(1) of this permit.

c. Emission Limitation

The combined VOC emissions from emissions units P001, P002, P003, P006, P007, P008, P009 and P010 shall not exceed 1.6 tons per month.

Applicable Compliance Method

Compliance with this limitation shall be based upon the record keeping in d)(2) of this permit.

d. Emission Limitation

The combined VOC emissions from emissions units P001, P002, P003, P006, P007, P008, P009 and P010 shall not exceed 19.19 TPY.

Applicable Compliance Method

Compliance with this limitation shall be based upon the record keeping in d)(2) of this permit.

e. Emission Limitation

The combined VOC emissions from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, R001, R002, and R003 shall not exceed 155.60 tons VOC per rolling 12-month summation.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in d)(2) of this permit.

[Note: After the revision of to OAC rule 3745-21-07(G) is approved into the Ohio SIP, f)(1)a and f)(1)b shall be void.].

g) Miscellaneous Requirements

(1) The terms and conditions listed in this permit to install shall supercede all the terms and conditions for this emissions unit contained in permit to install 08-04853 as issued on October 30, 2007.