State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
MIAMI COUNTY

Street Address:
122 S. Front Street
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 08-04679
Fac ID: 0855100393
DATE: 6/30/2005

Retterbush Injection Molded Fiberglass
Mike Palsgrove
PO Box 207 719 Long Drive
Piqua, OH 45356

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

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

cc: **USEPA** **RAPCA**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 6/30/2005**
Terms and Conditions	**Effective Date: 6/30/2005**

FINAL PERMIT TO INSTALL 08-04679

Application Number:	08-04679
Facility ID:	0855100393
Permit Fee:	**$400**
Name of Facility:	Retterbush Injection Molded Fiberglass
Person to Contact:	Mike Palsgrove
Address:	PO Box 207 719 Long Drive Piqua, OH 45356

Location of proposed air contaminant source(s) [emissions unit(s)]:
719 Long Dr
Piqua, **Ohio**

Description of proposed emissions unit(s):
Chapter 21 modification replacing PTI 08-04374 issued 7/8/03 to increase use of low pressure molding compounds.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Joseph P. Koncelik

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping 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 (a) any deviations (excursions) from 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 appropriate Ohio EPA District Office or local air 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 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.)

3. 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.

4. 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.

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 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).

6. 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.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. 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 this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
Organic compounds	16.7
individual HAP (Styrene)	9.9

Emissions Unit ID: **P003**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P003 - Resin spray up and hand lay up booth *Modification	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.54 lbs/hour, 37.0 lbs/day and 5.70 TPY, excluding cleanup. See A.2.a. The OC emissions from non-photochemically reactive cleanup material use in this emissions unit shall not exceed 3.05 TPY. The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B).
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	The individual hazardous air pollutant (HAP) emissions from emissions units P003, P004 and P005 combined shall not exceed 9.9 TPY, on a 12-month rolling basis.
	OAC rule3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The lbs/hour and lbs/day limitations were established for PTI purposes 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. Operational Restrictions

1. Resin use in this emissions unit shall not exceed 128 tons per year based on a rolling 12-month summation. The permittee has existing resin usage records and therefore does not need to be limited in the first year on a monthly basis.

2. The concentration of styrene in the resins applied in this emissions unit shall not exceed 34% and an emission factor of 89 pounds styrene per ton of resin applied in accordance with Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001.

3. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month, for each resin and catalyst employed in this emissions unit:

   a. The company identification for each resin and catalyst employed.

   b. The total number of gallons of each resin and catalyst employed.

   c. The organic compound content of each resin and catalyst, in pounds per gallon.

   d. The method of application for each resin employed.

   e. The HAP (styrene) content of each resin employed, in percent by weight.

   f. The total organic compound emissions from all resins and catalysts employed, in pounds (see calculation methodology in Section E.1.c.).

   g. The rolling 12-month summation of resin usage, in tons.

h. The rolling 12 month summation of individual HAP emissions from all resins and catalysts employed, in tons, (see calculation methodology in Section E.1.e.).

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

a. The company identification of each cleanup material employed in this emissions unit.

b. Whether or not each cleanup material employed is a photochemically reactive material.

c. The volume, in gallons, of cleanup material employed.

d. The organic compound content of each cleanup material, in pounds per gallon.

e. The total organic compound emission rate from all non-photochemically reactive cleanup materials employed, in pounds or tons per month © x d).

3. The permit to install for this emissions unit P003 was evaluated based on the actual materials (coatings) employed, and the design parameters of the emissions units 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 (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration
from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Styrene

TLV(mg/m^3): 114,650

Maximum Hourly Emission Rate (lbs/hr): 1.54

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m^3): 257

MAGLC(ug/m^3): 1,147

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 the new materials, that would result in the emission of a compound with a lower Threshold Limit Value(TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;

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

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

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

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

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

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

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

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:

a. Each month that the 12 month rolling summation of resin use in this emissions unit exceeds 128 tons.

b. Any resins applied in this emissions unit with a styrene concentration that exceeds 34%.

c. Any exceedances of the rolling, 12-month single individual HAP emissions limitation.

The quarterly deviation (excursion) reports shall be submitted as specified in section A.2.b of the General Terms and Conditions.

2. The permittee shall submit deviation reports that identify each month during which any photochemically reactive cleanup material was employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive cleanup material(s), and the estimated total quantity of the material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the deviation.

3. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify:

a. The total OC emissions, in tons, from resin and catalyst usage in this emissions unit.

b. The total OC emissions, in tons, from non-photochemically reactive cleanup materials employed in this emissions unit.

c. The total HAP emissions, in tons, from resin and catalyst usage in this emissions unit.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 1.54 lbs/hour.

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum hourly resin usage rate (0.0173 ton per hour) by the maximum emission factor of 89 lbs OC (styrene) per ton of resin as determined according to Table 3 of the Engineering Environmental Consulting Services document, Technical

Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001.

b. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 37.0 lbs/day excluding cleanup.

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum daily resin usage rate (0.414 ton per day) by the maximum emission factor of 89 lbs OC (styrene) per ton of resin as determined according to Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001.

c. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 5.70 TPY, excluding cleanup.

Applicable Compliance Method -
Compliance shall be determined by multiplying the monthly resin usage rate, in tons, by the appropriate emission factor (maximum emissions factor of 89 lbs OC (styrene) per ton of resin) as determined according to Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001, and shall be the summation of the monthly OC emission rates for the year, divided by 2,000 pounds per ton.

d. Emission Limitation -
The OC emissions from non-photochemically reactive cleanup material use in this emissions unit shall not exceed 3.05 TPY.

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.2. and shall be the summation of the monthly OC emission rates for the year, divided by 2,000 pounds per ton.

e. Emission Limitation -
The individual HAP emissions from emissions units P003, P004 and P005 combined shall not exceed 9.9 TPY, on a 12-month rolling basis.

Applicable Compliance Method -

i. Compliance for emissions unit P003 shall be determined by multiplying the monthly resin usage rate in this emissions unit, in tons, by the appropriate emission factor (maximum emissions factor of 89 lbs styrene per ton of resin) as determined according to Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001.

ii. Compliance for emissions unit P004 shall be determined by multiplying the monthly RTM and LPMC usage rate by the emission factor of 9.6 lbs styrene per ton of RTM or LPMC as determined according to emission factor guidance and equations developed by the Composites Fabricators Association for compression molding and resin transfer molding, July 23, 2001.

iii. Compliance for emissions unit P005 shall be determined by multiplying monthly gelcoat usage rate in tons by the appropriate emission factor per ton of gelcoat (maximum of 356 lbs styrene per ton of gelcoat) as determined according to Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001.

iv. Compliance shall be determined by the rolling summation of the monthly HAP emission rates for emissions units P003, P004 and P005 (i + ii + iii) for the previous 12 months, divided by 2,000 pounds per ton.

F. Miscellaneous Requirements

1. The terms and conditions in sections A, B, C.1., C.2., D, and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.

2. PTI 08-04374 issued July 8, 2003 was a modification of PTI 08-03002 issued January 24, 1991. This PTI (08-04679) represents an annual OC emissions decrease for this emissions unit. The adjustment in OC emissions allows for production decreases in this emissions unit and production increases in emissions unit P004 at the facility while maintaining HAP emissions below major source levels for Title V and Maximum Achievable Control Technology (MACT) permitting requirements.

Emissions Unit ID: **P004**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P004 - Low Pressure Molding Compound (LPMC) and Resin Transfer Molding (RTM) *Modification	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.37 lbs/hour, 32.9 lbs/day and 1.0 TPY, excluding cleanup. See A.2.a. The OC emissions from non-photochemically reactive cleanup material use in this emissions unit shall not exceed 3.05 TPY. The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B).
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	The individual hazardous air pollutant (HAP) emissions from emissions units P003, P004 and P005 combined shall not exceed 9.9 TPY, on a 12-month rolling basis.
	OAC rule3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the

emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The lbs/hr and lbs/day limitations were established for PTI purposes 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. Operational Restrictions

1. Resin transfer molding (RTM) compound and low pressure molding compound (LPMC) use in this emissions unit shall not exceed 208 tons per year on a rolling 12-month summation. The permittee has existing resin usage records and therefore does not need to be limited in the first year on a monthly basis.

2. The concentration of styrene in the RTM compound and LPMC used in this emissions unit shall not exceed 48% and an emission factor of 9.6 pounds styrene per ton of resin used; in accordance with emission factor guidance and equations developed by the Composites Fabricators Association for compression molding and resin transfer molding.

3. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month for each resin, molding compound and catalyst employed in this emissions unit:

   a. The company identification for each resin, molding compound and catalyst employed.

   b. The total number of gallons of each resin and catalyst employed and the tons of molding compound used.

   c. The OC content of each resin, molding compound and catalyst, in pounds per gallon or pounds per ton.

   d. The method of use for each resin and molding compound employed (RTM or LPMC).

e. The HAP (styrene) content of each resin and molding compound employed, in percent by weight.

f. The total OC emissions from all resins and catalysts employed, in pounds (see calculation methodology in Section E.1.c.).

g. The rolling 12-month summation of RTM and LPMC usage, in tons.

h. The rolling 12 month summation of individual HAP emissions from all resins and catalysts employed, in tons, (see calculation methodology in Section E.1.e.).

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

a. The company identification of each cleanup material employed in this emissions unit.

b. Whether or not each cleanup material employed is a photochemically reactive material.

c. The volume, in gallons, of cleanup material employed.

d. The OC content of each cleanup material, in pounds per gallon.

e. The total OC emission rate from all non-photochemically reactive cleanup materials employed, in pounds or tons per month © x d).

3. The permit to install for this emissions unit P004 was evaluated based on the actual materials (coatings) employed, and the design parameters of the emissions units 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 (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration
from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Styrene

TLV(mg/m^3): 114,650

Maximum Hourly Emission Rate (lbs/hr): 1.37

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m^3): 231

MAGLC(ug/m^3): 1,147

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 the new materials, that would result in the emission of a compound with a lower Threshold Limit Value(TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;

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

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

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

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

a. A description of the parameters changed (composition of materials, new pollutants

emitted, change in stack/exhaust parameters, etc.);

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

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

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:

   a. Each month that the 12 month rolling summation of RTM and LPMC usage in this emissions unit exceeds 208 tons.

   b. Any resins applied in this emissions unit with a styrene concentration that exceeds 48%.

   c. Any exceedances of the rolling, 12-month single individual HAP emissions limitation.

   The quarterly deviation (excursion) reports shall be submitted as specified in section A.2.b of the General Terms and Conditions.

2. The permittee shall submit deviation reports that identify each month during which any photochemically reactive cleanup material was employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive cleanup material(s), and the estimated total quantity of the material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the deviation.

3. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify:

   a. The total OC emissions, in tons, from RTM and LPMC usage in this emissions unit.

   b. The total OC emissions, in tons, from non-photochemically reactive cleanup materials employed in this emissions unit.

   c. The total HAP emissions, in tons, from RTM and LPMC usage in this emissions unit.

   These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

   a. Emission Limitation -
   The OC emissions from this emissions unit shall not exceed 1.37 lbs/hour, excluding cleanup.

   Applicable Compliance Method -
   Compliance shall be determined as follows:

   Compliance shall be determined by multiplying the maximum hourly resin usage rate (0.143 ton per hour) by the emission factor of 9.6 lbs OC (styrene) per ton of resin transfer or low pressure molding compound as determined according to emission factor guidance and equations developed by the Composites Fabricators Association for compression molding and resin transfer molding, July 23, 2001.

   b. Emission Limitation -
   The OC emissions from this emissions unit shall not exceed 32.9 lbs/day, excluding cleanup.

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum hourly resin usage rate (3.43 ton per day) by the emission factor of 9.6 lbs OC (styrene) per ton of resin transfer or low pressure molding compound as determined according to emission factor guidance and equations developed by the Composites Fabricators Association for compression molding and resin transfer molding, July 23, 2001

c. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 1.0 TPY, excluding cleanup.

Applicable Compliance Method -
Compliance shall be determined by multiplying the monthly resin usage rate by the emission factor of 9.6 lbs OC (styrene) per ton of resin transfer or low pressure molding compound as determined according to emission factor guidance and equations developed by the Composites Fabricators Association for compression molding and resin transfer molding, July 23, 2001.

d. Emission Limitation -
The OC emissions from non-photochemically reactive cleanup material use in this emissions unit shall not exceed 3.05 TPY.

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.2. and shall be the summation of the monthly OC emission rates (pounds per month) for the year, divided by 2,000 pounds per ton.

e. Emission Limitation -
The individual HAP emissions from emissions units P003, P004 and P005 combined shall not exceed 9.9 TPY, on a 12-month rolling basis.

Applicable Compliance Method -

i. Compliance for emissions unit P003 shall be determined by multiplying the monthly resin usage rate in this emissions unit, in tons, by the appropriate emission factor (maximum emissions factor of 89 lbs styrene per ton of resin) as determined according to Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001.

ii. Compliance for emissions unit P004 shall be determined by multiplying the

monthly RTM and LPMC usage rate by the emission factor of 9.6 lbs styrene per ton of RTM or LPMC as determined according to emission factor guidance and equations developed by the Composites Fabricators Association for compression molding and resin transfer molding, July 23, 2001.

iii. Compliance for emissions unit P005 shall be determined by multiplying monthly gelcoat usage rate in tons by the appropriate emission factor per ton of gelcoat (maximum of 356 lbs styrene per ton of gelcoat) as determined according to Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001.

iv. Compliance shall be determined by the rolling summation of the monthly HAP emission rates for emissions units P003, P004 and P005 (i + ii + iii) for the previous 12 months, divided by 2,000 pounds per ton.

F. Miscellaneous Requirements

1. The terms and conditions in sections A, B, C.1., C.2., D, and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.

2. PTI 08-04374 issued July 8, 2003 was a modification of PTI 08-03002 issued January 24, 1991. This PTI (08-04679) represents an annual OC emissions increase for this emissions unit. The adjustment in OC emissions allows for production decreases in emissions unit P003 and production increases in emissions unit P004 at the facility while maintaining HAP emissions below major source levels for Title V and Maximum Achievable Control Technology (MACT) permitting requirements.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P005 - Gelcoat Booth for FRP *Modification	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.51 lbs/hour, 36.2 lbs/day and 3.9 TPY, excluding cleanup. See A.2.a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B).
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	The individual hazardous air pollutant (HAP) emissions from emissions units P003, P004 and P005 combined shall not exceed 9.9 TPY, on a 12-month rolling basis.
	OAC rule3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The lbs/hr and lbs/day limitation was established for PTI purposes 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. Operational Restrictions

1. Gelcoat use in this emissions unit shall not exceed 18.0 tons per year on a rolling 12-month summation. The permittee has existing gelcoat usage records and therefore does not need to be limited in the first year on a monthly basis.

2. The concentration of styrene in the gelcoats applied mechanically (sprayed) in this emissions unit shall not exceed 36% and an emission factor of 356 pounds styrene per ton of gelcoat in accordance with Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001.

3. The concentration of styrene in the gelcoats applied manually (by roller or brush) in this emissions unit shall not exceed 50% and an emission factor of 180 pounds styrene per ton of gelcoat in accordance with Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001.

4. The concentration of methyl methacrylate in the gel coats applied shall not exceed 5% and an emissions factor of 75 pounds of methyl methacrylate per ton of gel coat in accordance with Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month for each resin and catalyst employed in this emissions unit:

   a. The company identification for each gelcoat and catalyst employed.

   b. The total number of gallons of each gelcoat and catalyst employed.

   c. The OC content of each gelcoat and catalyst, in pounds per gallon.

   d. The method of application for each gelcoat employed.

e. The styrene and methyl methacrylate content of each resin employed, in percent by weight.

f. The total OC emissions from all gelcoats and catalysts employed, in pounds (see calculation methodology in Section E.1.c.).

g. The rolling 12-month summation of gelcoat usage, in tons.

h. The rolling 12 month summation of individual HAP emissions from all resins and catalysts employed, in tons, (see calculation methodology in Section E.1.d.).

2. The permit to install for this emissions unit P005 was evaluated based on the actual materials (coatings) employed, and the design parameters of the emissions units 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 (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration
from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Styrene

TLV(mg/m^3): 114,650

Maximum Hourly Emission Rate (lbs/hr): 1.51

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m^3): 254

MAGLC(ug/m^3): 1,147

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 the new materials, that would result in the emission of a compound with a lower Threshold Limit Value(TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;

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

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

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

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

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

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

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

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:

a. Each month that the 12 month rolling summation of gelcoat use in this emissions unit exceeds 18.0 tons.

b. Any gelcoat applied in this emissions unit with a styrene concentration that exceeds 36% for mechanically applied gelcoats or 50% for manually applied gelcoats or a methyl methacrylate concentration that exceeds 5%.

c. Any exceedances of the rolling, 12-month single individual HAP emissions limitation.

The quarterly deviation (excursion) reports shall be submitted as specified in section A.2.b of the General Terms and Conditions.

2. The permittee shall submit deviation reports that identify each month during which any photochemically reactive cleanup material was employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive cleanup material(s), and the estimated total quantity of the material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the deviation.

3. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify:

a. The total OC emissions, in tons, from gelcoat usage in this emissions unit.

b. The total HAP emissions, in tons, from gelcoat usage in this emissions unit.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 1.51 lbs/hour, excluding cleanup.

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum hourly resin usage rate (0.0035 ton per hour) by the maximum emission factor of 356 lbs OC (styrene) plus 75 lbs OC (methyl methacrylate) per ton of gelcoat as determined according to Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001.

b. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 36.2 lbs/day, excluding cleanup.

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum daily resin usage rate (0.084 ton per day) by the maximum emission factor of 356 lbs OC (styrene) plus 75 lbs OC (methyl methacrylate) per ton of gelcoat as determined according to Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001.

c. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 3.9 TPY, excluding cleanup.

Applicable Compliance Method -
Compliance shall be determined by multiplying monthly gelcoat usage rate in tons by the appropriate emission factor per ton of gelcoat (maximum of 356 lbs OC (styrene) per ton of gelcoat plus 75 lbs OC per ton of gelcoat (methyl methacrylate)) as determined according to Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001 and shall be the rolling summation of the monthly OC emission rates for the year, divided by 2,000 pounds per ton.

d. Emission Limitation -
The individual HAP emissions from emissions units P003, P004 and P005 combined shall not exceed 9.9 TPY, on a 12-month rolling basis.
Applicable Compliance Method -

i. Compliance for emissions unit P003 shall be determined by multiplying the monthly resin usage rate in this emissions unit, in tons, by the appropriate emission factor (maximum emissions factor of 89 lbs styrene per ton of resin) as determined according to Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001.

ii. Compliance for emissions unit P004 shall be determined by multiplying the monthly RTM and LPMC usage rate by the emission factor of 9.6 lbs of styrene per ton of RTM or LPMC as determined according to emission factor guidance and equations developed by the Composites Fabricators Association for compression molding and resin transfer molding, July 23, 2001.

iii. Compliance for emissions unit P005 shall be determined by multiplying monthly gelcoat usage rate in tons by the appropriate emission factor per ton of gelcoat (maximum of 356 lbs styrene per ton of gelcoat) as determined according to Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001.

iv. Compliance shall be determined by the rolling summation of the monthly HAP emission rates for emissions units P003, P004 and P005 (i + ii + iii) for the previous 12 months, divided by 2,000 pounds per ton.

F. Miscellaneous Requirements

1. The terms and conditions in sections A, B, C.1., C.2., D, and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.

2. PTI 08-04374 issued July 8, 2003 was a modification of PTI 08-03002 issued January 24, 1991. This PTI (08-04679) represents no change in OC emissions increase for this emissions unit. The adjustment in OC emissions allows for production increases in emissions unit P004 and production decreases in emissions unit P003 at the facility while maintaining HAP emissions below major source levels for Title V and Maximum Achievable Control Technology (MACT) permitting requirements.