John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

10/22/2013

Certified Mail

Mr. Bret Busch
AL-CO Products, Inc.
485 SECOND ST
Latty, OH 45855

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0363000035
Permit Number: P0115247
Permit Type: Renewal
County: Paulding

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-NWDO

Response to Comments

Facility ID:	0363000035
Facility Name:	AL-CO Products, Inc.
Facility Description:	Polyester Resin Castings Fabricator
Facility Address:	485 SECOND ST LATTY, OH 45855 Paulding County
Permit:	P0115247, Permit-To-Install and Operate - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Paulding Progress on 09/16/2013. The comment period ended on 10/16/2013.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

a. Comment: NO COMMENTS WERE RECEIVED.

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
AL-CO Products, Inc.

Facility ID:	0363000035
Permit Number:	P0115247
Permit Type:	Renewal
Issued:	10/22/2013
Effective:	10/22/2013
Expiration:	10/22/2018

Division of Air Pollution Control
Permit-to-Install and Operate
for
AL-CO Products, Inc.

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Authorization

Facility ID:	0363000035
Application Number(s):	A0048429, A0048691
Permit Number:	P0115247
Permit Description:	FEPTIO permit renewal for reinforced composites fabrication operations.
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	10/22/2013
Effective Date:	10/22/2013
Expiration Date:	10/22/2018

Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

AL-CO Products, Inc.
485 SECOND ST
LATTY, OH 45855

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

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0115247
Permit Description: FEPTIO permit renewal for reinforced composites fabrication operations.

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

Emissions Unit ID:	**P001**
Company Equipment ID:	Casting Area
Superseded Permit Number:	03-09641
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R001**
Company Equipment ID:	Gel Coat Booth #1
Superseded Permit Number:	03-09641
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement.Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is takenby Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

[1] Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

C. Emissions Unit Terms and Conditions

1. P001, Casting Area

Operations, Property and/or Equipment Description:

Casting Operation - Polyester Resin (Manual Open Molding)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., b)(2)a., c)(1), d)(3)c., d)(3)d., e)(1) and f)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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)	0.97 lb organic compounds (OC)/hr, from casting operations 0.58 ton OC/month, 7.0 tons/yr, from clean-up operations (for emissions units P001 and R001, combined)
b.	OAC rule 3745-31-05(D)	9.9 tons volatile organic compounds (VOC) per rolling, 12-month period (for emissions units P001 and R001, combined) 9.9 tons hazardous air pollutants (HAPs) per rolling, 12-month period (for emissions units P001 and R001, combined) [See b)(2)a.]

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations:

i. combined annual HAP emissions of 9.9 tons per rolling, 12-month period, for emissions unit P001 and R001, combined; and

ii. combined annual VOC emissions of 9.9 tons per rolling, 12-month period, for emissions units P001 and R001, combined.

This emissions unit has been in operation for over 12 months and, for the purposes of demonstrating compliance with the first 12 months of the rolling restrictions, the permittee shall use existing records verified by the Ohio EPA, Northwest District Office.

b. The hourly OC emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

c) Operational Restrictions

(1) The maximum rolling, 12-month quantity of VOC-containing materials employed in emissions units P001 and R001, combined, is limited by the following equation(s):

$$\sum_{M=1}^{12} \sum_{n} [(V_i)(G_i)(EF_i)(1 \text{ ton} / 2000 \text{ lbs})] = E_R$$

Where,

E_R = VOC emissions, resin casting operations, in tons
M = the increment of the rolling, 12-month period;
V_i = VOC (i.e. monomer) content, in percent by weight, of each material employed
G_i = pounds used of each VOC containing material for the rolling 12-month period
EF_i = emissions factor, for each material and process employed
n = total number of unique VOC containing materials employed

$$\sum_{M=1}^{12} \sum_{n} \{(G_i) x [0.4506 x (V_i)] -0.0505\} (1 \text{ ton} / 2000 \text{ lbs})] = E_G$$

where,

E_G = VOC emissions, gelcoat spray operations, in tons
M = the increment of the rolling, 12-month period;
V_i = VOC (i.e. monomer) content, in percent by weight, of each material employed
G_i = pounds used of each VOC containing material for the rolling 12-month period
n = total number of unique VOC containing materials employed

and $E_R + E_G \leq 9.9$

This emissions unit has been in operation for over 12 months and, for the purposes of demonstrating compliance with the first 12 months of the rolling restriction, the permittee shall use existing records verified by the Ohio EPA, Northwest District Office.

(2) The permittee shall not employ any cleanup material in this emissions unit that contains any HAPs. "HAPs" is defined in OAC rule 3745-31-01(WW).

d) Monitoring and/or Recordkeeping Requirements

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

a. the company name and identification for each resin employed;

b. the amount of each resin employed, in pounds;

c. the amount of VOC/HAP* (i.e. monomer), in percent by weight, of each resin employed;

d. the VOC/HAP emission rate** for each resin employed [d)(1)b. x d)(1)c. x 0.03], in pounds; and

e. the total VOC/HAP emission rate for all the resins employed, in pounds [summation of d)(1)d. for all resins].

* all monomer content is assumed for the purposes of these records to be both VOC and HAP

** based on Composite Fabricators Association (CFA) emissions factors for closed molding (April 2003)

(2) The permittee shall calculate and record the following information each month, for emissions units P001 and R001, combined:

a. the company identification for each clean-up material employed;

b. documentation on whether or not each cleanup material employed contains HAPs;

c. the quantity of each cleanup material employed, in gallons;

d. the OC content of each cleanup material employed, in pounds/gallon;

e. the VOC content (as applicable) of each cleanup material employed, in pounds/gallon;

f. the OC emissions for each cleanup material employed [d)(2)c. x d)(2)d.], in pounds;

g. the total OC emissions for all the cleanup materials employed [summation of d)(2)f. x ton/2000 lbs, for all cleanup materials], in tons;

h. the VOC emissions for each cleanup material employed [d)(2)c. x d)(2)e.], in pounds; and

i. the total VOC emissions for all the cleanup materials employed [summation of d)(2)h. for all cleanup materials], in pounds.

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

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

(3) The permittee shall, in conjunction with the information required in d)(1) and d)(2), collect and record the following information each month for emissions units P001 and R001, combined:

a. the total VOC/HAP emission rate for all the resins /gelcoats employed, in pounds [i.e. the summation of the daily VOC/HAP emissions in d)(1)e., for emissions units P001 and R001, combined];

b. the total VOC emission rate for all the cleanup materials employed, in pounds [i.e. from d)(2)i. for emissions units P001 and R001, combined];

c. the rolling 12-month combined HAP emissions, in tons [i.e. rolling 12-month total for d)(3)a.]; and

d. the rolling 12-month combined VOC emissions, in tons {i.e. rolling 12-month total for [d)(3)a. + d)(3)b.]}.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports for this emissions unit identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the 9.9 tons per rolling 12-month period for either VOC or HAP; and

ii. allexceedances of the material usage restrictions in c)(1).

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, thepermittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted,electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
0.97 lb OC /hr

Applicable Compliance Method:
The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established based on a maximum throughput of 98 lbs resin per hour, multiplied by a maximum styrene (OC monomer) content of 0.33 (33%), then multiplied by an emission factor of 0.03 (3%) (based on CFA emission factor).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on Methods 18, 25, 25a, as appropriate, of 40 CFR Part 60.

b. Emission Limitation:
9.9 tons VOC or HAPS per rolling, 12-month period
(for emissions units P001 and R001, combined)

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation through the record keeping required in d)(3).

c. Emission Limitations:
0.58 ton OC /month, 7.0 ton /yr, from cleanup operations (for emissions units P001 and R001 combined)

Applicable Compliance Method:
The permittee shall demonstrate compliance with the monthly emission limitation through the record keeping required in d(2)g.

The annual emission limitation was developed by multiplying the monthly emission limitation by a maximum operating schedule of 12 months/year, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the monthly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

(2) Formulation data, or USEPA Method 24 or 311, shall be used to determine the monomer (VOC/HAP) content of each resin /gelcoat, or the OC/VOC content of cleanup material.

g) Miscellaneous Requirements

(1) None.

2. R001, Gel Coat Booth #1

Operations, Property and/or Equipment Description:

Gelcoat Spray Booth (non-atomized spray)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., b)(2)a., c)(1), d)(3)c., d)(3)d., e)(1), and f)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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)	5.8 lb organic compounds (OC)/hr, from gel-coat operations 0.58 ton OC /month, 7.0 tons/yr, from clean-up operations (for emissions units P001 and R001 combined)
b.	OAC rule 3745-31-05(D)	9.9 tons volatile organic compounds (VOC) per rolling, 12-month period (for emissions units P001 and R001, combined) 9.9 tons hazardous air pollutants (HAPs) per rolling, 12-month period (for emissions units P001 and R001, combined) [See b)(2)a.]

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations:

i. combined annual HAP emissions of 9.9 tons per rolling, 12-month period, for emissions unit P001 and R001, combined; and

ii. combined annual VOC emissions of 9.9 tons per rolling, 12-month period, for emissions units P001 and R001, combined.

This emissions unit has been in operation for over 12 months and, for the purposes of demonstrating compliance with the first 12 months of the rolling restrictions, the permittee shall use existing records verified by the Ohio EPA, Northwest District Office.

b. The hourly OC emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

c) Operational Restrictions

(1) The maximum rolling 12-month quantity of VOC-containing materials employed in emissions units P001 and R001 combined, is limited by the following equation(s):

$$\sum_{M=1}^{12} \sum_{n} [(V_i)(G_i)(EF_i)(1 \text{ ton} / 2000 \text{ lbs})] = E_R$$

where,

E_R = VOC emissions, resin casting operations, in tons
M = the increment of the rolling, 12-month period;
V_i = VOC (i.e. monomer) content, in percent by weight, of each material employed
G_i = pounds used of each VOC containing material for the rolling 12-month period
EF_i = emissions factor, for each material and process employed
n = total number of unique VOC containing materials employed

$$\sum_{M=1}^{12} \sum_{n} \{(G_i) x [0.4506 x (V_i)] -0.0505\} (1 \text{ ton} / 2000 \text{ lbs})] = E_G$$

where,

E_G = VOC emissions, gelcoat spray operations, in tons
M = the increment of the rolling, 12-month period;
V_i = VOC (i.e. monomer) content, in percent by weight, of each material employed
G_i = pounds used of each VOC containing material for the rolling 12-month period
n = total number of unique VOC containing materials employed

and $E_R + E_G \leq 9.9$

This emissions unit has been in operation for over 12 months and, for the purposes of demonstrating compliance with the first 12 months of the rolling restriction, the permittee shall use existing records verified by the Ohio EPA, Northwest District Office.

(2) The permittee shall not employ any cleanup material in this emissions unit that contains any HAPs. "HAPs" is defined in OAC rule 3745-31-01(WW).

d) Monitoring and/or Recordkeeping Requirements

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

a. the company name and identification for each gelcoat employed;

b. the amount of each gelcoat employed, in pounds;

c. the amount of VOC/HAP* (i.e. monomer), in percent by weight, of each gelcoat employed;

d. the VOC/HAP emission rate** for each gelcoat employed {d)(1)b. x [0.4506 x d(1)c.] - 0.0505}, in pounds; and

e. the total VOC/HAP emission rate for all the resins employed, in pounds [summation of d)(1)d. for all gelcoat].

* all monomer content is assumed for the purposes of these records to be both VOC and HAP

** based on Composite Fabricators Association (CFA) emissions factors for closed molding (April 2003)

(2) The permittee shall calculate and record the following information each month, for emissions units P001 and R001, combined:

a. the company identification for each clean-up material employed;

b. documentation on whether or not each cleanup material employed contains HAPs;

c. the quantity of each cleanup material employed, in gallons;

d. the OC content of each cleanup material employed, in pounds/gallon;

e. the VOC content (as applicable) of each cleanup material employed, in pounds/gallon;

f. the OC emissions for each cleanup material employed [d)(2)c. x d)(2)d.], in pounds;

g. the total OC emissions for all the cleanup materials employed [summation of d)(2)f. x ton/2000 lbs, for all cleanup materials], in tons;

h. the VOC emissions for each cleanup material employed [d)(2)c. x d)(2)e.], in pounds; and

i. the total VOC emissions for all the cleanup materials employed [summation of d)(2)h. for all cleanup materials], in pounds.

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

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

(3) The permittee shall, in conjunction with the information required in d)(1) and d)(2), collect and record the following information each month for emissions units P001 and R001, combined:

a. the total VOC/HAP emission rate for all the resins /gelcoats employed, in pounds [i.e. the summation of the daily VOC/HAP emissions in d)(1)e., for emissions units P001 and R001, combined];

b. the total VOC emission rate for all the cleanup materials employed, in pounds [i.e. from d)(2)i. for both emissions units P001 and R001, combined];

c. the rolling 12-month combined HAP emissions, in tons [i.e. rolling, 12-month total for d)(3)a.]; and

d. the rolling 12-month combined VOC emissions, in tons {i.e. rolling, 12-month total for [d)(3)a. + d)(3)b.]}.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports for this emissions unit identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the 9.9 tons per rolling, 12-month period for either VOC or HAP; and

ii. allexceedances of the material usage restrictions in c)(1).

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, thepermittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted,electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>
5.8 lb OC /hr

<u>Applicable Compliance Method:</u>
The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established based on a maximum throughput of 33 lbs resin per hour, multiplied by a maximum styrene (OC monomer) content of 0.50 (50%), then employed in the emissions equation {33 lbgelcoat /hr [0.4506 (0.50 lb OC /lbgelcoat) - 0.0505]} (based on ACMA emission factor).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on Methods 18, 25, 25a, as appropriate, of 40 CFR Part 60.

b. <u>Emission Limitation:</u>
9.9 tons VOC or HAPS per rolling, 12-moht period
(for emissions units P001 and R001 combined)

<u>Applicable Compliance Method:</u>
The permittee shall demonstrate compliance with this emission limitation through the record keeping required in d)(3).

c. Emission Limitations:
0.58 ton OC/month, 7.0 tons/yr, from cleanup operations (for emissions units P001 and R001, combined)

Applicable Compliance Method:
The permittee shall demonstrate compliance with the monthly emission limitation through the record keeping required in d(2)g.

The annual emission limitation was developed by multiplying the monthly emission limitation by a maximum operating schedule of 12 months/year, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the monthly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

(2) Formulation data, or USEPA Method 24 or 311, shall be used to determine the monomer (VOC/HAP) content of each resin /gelcoat, or the OC/VOC content of cleanup material.

g) Miscellaneous Requirements

(1) None.