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

10/28/2013

Certified Mail

Yes	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

Ms. Sharon Reed
Industrial Fiberglass Specialties, Inc
521 Kiser St.
Dayton, OH 45404-1641

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0857043336
Permit Number: P0115216
Permit Type: Renewal
County: Montgomery

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 Regional Air Pollution Control Agency at (937)225-4435 or 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: RAPCA

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Industrial Fiberglass Specialties, Inc

Facility ID:	0857043336
Permit Number:	P0115216
Permit Type:	Renewal
Issued:	10/28/2013
Effective:	10/28/2013
Expiration:	10/28/2018

Division of Air Pollution Control
Permit-to-Install and Operate
for
Industrial Fiberglass Specialties, Inc

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Authorization

Facility ID:	0857043336
Application Number(s):	A0048345
Permit Number:	P0115216
Permit Description:	PTIO renewal for fiberglass reinforced plastic, filament pipe winding stations identified as units P001, through P003 and clean up solvent emissions identified as emissions unit P005.
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	10/28/2013
Effective Date:	10/28/2013
Expiration Date:	10/28/2018

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

This document constitutes issuance to:

Industrial Fiberglass Specialties, Inc
521 Kiser St.
Dayton, OH 45404-1641

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:

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

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: P0115216
Permit Description: PTIO renewal for fiberglass reinforced plastic, filament pipe winding stations identified as units P001, through P003 and clean up solvent emissions identified as emissions unit P005.

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

Emissions Unit ID:	**P005**
Company Equipment ID:	FWSC#1
Superseded Permit Number:	08-04928
General Permit Category and Type:	Not Applicable

Group Name: FRP Filament Winding

Emissions Unit ID:	**P001**
Company Equipment ID:	PWS#2
Superseded Permit Number:	08-04928
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	PWS#3
Superseded Permit Number:	08-04928
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P003**
Company Equipment ID:	FLGWS#1
Superseded Permit Number:	08-04928
General Permit Category andType:	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. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. 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 taken by 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 of this permit 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 [DO/LAA] 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 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 emission 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 beingpermanently shut down without first applying for and obtaining a permit pursuantto OAC Chapter 3745-31.

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.

2. The emissions of hazardous air pollutants (HAPs), as defined in Section 112(b) of Title III of the Clean Air Act, from all the emissions units at this facility, shall not exceed 9.9 tons for any individual HAP and 24.9 tons for any combination of HAPs, on a rolling 12-month basis.

3. The permittee shall keep records for the entire facility each month of the following information:

   a) The identification of each HAP employed.

   b) The quantity, in pounds or tons, of each HAP employed.

   c) The quantity, in pounds or tons, of all the HAPs employed.

   d) The total facility-wide emissions (and associated calculations) for each individual HAP, in tons, (calculated by the sum of the individual HAP emission rates from all the emissions units at the facility using the equations in table 1 to Subpart WWWW of 40CFR 63 or any HAP emissions factor approved by U.S. EPA).

   e) The total facility-wide emissions (and associated calculations) for all combined HAPs, in tons, (calculated by summing all combined HAPs emission rates from all the emissions units at the facility using the equations in table 1 to Subpart WWWW of 40CFR 63 or any emissions factor approved by U.S. EPA).

   f) The rolling 12-month sum of the total individual HAP emissions rates for each HAP from all the emissions units at the facility, in tons, (the sum of individual HAP emissions rates calculated according to 3.d) for the previous 12 months).

   g) The rolling 12-month sum of the total combined HAP emissions rates from all the emissions units at the facility, in tons, (the sum of combined HAP emissions rates calculated according to 3.e) for the previous 12 months).

4. The permittee shall submit quarterly deviation (excursion) reports, in accordance with Part I of the Standard Terms and Conditions, of this permit, of the following information:

   a) An identification of each month during which the rolling, 12-month individual HAP emissions rate (from the facility) exceeded 9.9 tons, and the actual rolling, 12-month sum of each individual HAP emissions rate (from the facility) for each such month.

b) An identification of each month during which the rolling, 12-month combination of all HAP emissions rates (from the facility) exceeded 24.9 tons, and the actual rolling, 12-month sum of the combination of all HAP emissions rates (from the facility) for each such month.

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

The quarterly reports shall be submitted, 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). Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

5. The permittee shall submit annual reports that summarize the annual emissions of each individual HAP and the combined emissions of all the HAPs for the facility. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Synthetic Minor Title V Fee Emission Report.

C. Emissions Unit Terms and Conditions

1. P005, FWSC#1

Operations, Property and/or Equipment Description:

Solvent Cleaning Emissions

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. None.

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) PTI 08-04928 issued August 13, 2008	The organic compound (OC) emissions from clean up solvents shall not exceed 9.60 tons per year. See b)(2)a.
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V and 40 CFR Part 63, Subpart WWWW)	See Section B.2. through B.5.

(2) Additional Terms and Conditions

a. This emissions unit was installed prior to August 3, 2006, therefore, it is still subject to the Best Available Technology (BAT) requirements of OAC rule 3745-31-05(A)(3) that were effective prior to that date.

c) Operational Restrictions

(1) The volume of clean up solvent used shall not exceed 4,000 gallons per year.

d) Monitoring and/or Recordkeeping Requirements

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

a. The company identification for each clean up material employed.

b. The volume, in gallons, of each clean up material employed.

c. The OC concentration, in pounds of OC per gallon, for each clean up material employed.

d. The OC emissions rate, in pounds or tons, from all clean up materials (the product of d)(1)b multiplied by d)(1)c for all clean up solvents employed).

e) Reporting Requirements

(1) 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 e-Business 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 emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. <u>Emission Limitation</u> -

The OC emissions from clean up solvents shall not exceed 9.60 tons per year.

<u>Applicable Compliance Method</u> -

Compliance with this emissions limitation shall be determined according to the record keeping requirements in d)(1) and shall be the sum of the monthly OC emissions rates for the 12 months of each calendar year.

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group -FRP Filament Winding: P001,P002,P003,

EU ID	Operations, Property and/or Equipment Description
P001	Fiberglass Reinforced Plastic, Filament Winding, Pipe Winding Station No. 2
P002	Reinforced Fiberglass Products, Filament Winding, Pipe Winding Station No. 3
P003	Fiberglass Reinforced Products, filament Winding, Flange Station No. 1

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. None.

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) PTI 08-04928 issued August 13, 2008	<u>Emissions Unit P001</u>: The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 12.9 pounds/day and 2.36 tons per year, excluding cleanup. <u>Emissions Unit P002</u>: The VOC emissions from this emissions unit shall not exceed 12.9 pounds/day and 2.36 tons per year, excluding cleanup. <u>Emissions Unit P003</u>: The VOC emissions from this emissions unit shall not exceed 11.0 pounds/day and 2.01 tons per year, excluding cleanup. See b)(2)a. and b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V and 40 CFR Part 63, Subpart WWWW)	See Section B.2. through B.5.
c.	OAC rule 3745-21-25	The VOC emissions from this emissions unit shall not exceed the limitations specified in Table 2 of the rule for open molding operations. See b)(2)c.
d.	OAC rule 3745-114-01 ORC 3704.03(F)	

(2) Additional Terms and Conditions

a. These emissions units were installed prior to August 3, 2006, therefore, they are still subject to the Best Available Technology (BAT) requirements of OAC rule 3745-31-05(A)(3) that were effective prior to that date.

b. The daily VOC emissions limitations were established to reflect the potential to emit for these emissions units. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

c. The VOC threshold for this facility calculated according OAC 3745-21-25(F) is less than 100 tons per year. The VOC emissions from resin application in this emissions unit shall not exceed the following:

Type of operation	Resin application method	VOC emissions limit
Open molding: corrosion resistant and/or high strength (CR/HS)	Mechanical resin application	113 pounds/ton applied
	Filament application	171 pounds/ton applied
	Manual resin application	123 pounds/ton applied
Open molding: non-CR/HS	Mechanical resin application	88 pounds/ton applied
	Filament application	188 pounds/ton applied
	Manual resin application	87 pounds/ton applied
Open molding: low-flame spread/low-smoke products	Mechanical resin application	497 pounds/ton applied
	Filament application	270 pounds/ton applied
	Manual resin application	238 pounds/ton applied
Open molding: shrinkage controlled resins	Mechanical resin application	354 pounds/ton applied
	Filament application	215 pounds/ton applied
	Manual resin application	180 pounds/ton applied

c) Operational Restrictions

(1) The permittee must keep containers that store VOC containing materials closed or covered except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall record the following information for each month:

a. The company identification of each neat resin (as purchased), catalyst and VOC additives employed;

b. The weight, in tons, of each resin, as applied;

c. The weight, in pounds, of each catalyst employed;

d. The VOC (monomer) concentration of each resin, as applied, in percent by weight*;

e. The method of application for each resin employed (mechanical, manual or filament application);

f. The VOC emission factor for each resin employed, in pounds VOC per ton of resin employed calculated using the equations in table 1 to Subpart WWWW of 40CFR 63 or any VOC emissions factor approved by U.S. EPA;

g. The VOC emissions, in pounds, d)(1)b. multiplied by d)(1)f. for each resin applied.

Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The monomer content records may be based on MSDS or on resin specifications supplied by the resin supplier.

*This term is intended to be synonymous “neat resin plus” as used in OAC rule 3745-21-25. Neat resin plus means neat resin plus any VOC-containing materials that are added to the resin by the supplier or the facility. Neat resin plus does not include any added filler, reinforcements, catalysts, or promoters. Neat resin plus does include any additions of styrene or methyl methacrylate monomer in any form, including in catalysts and promoters

(2) The permitte shall use one the following methods to demonstrate compliance with the compliance with the VOC emissions limitations of Table 2 of OAC rule 3745-21-25:

a. Demonstrate that an individual resin, as applied, meets the applicable emission limit.

i. Calculate the actual VOC emissions factor for each different process stream within each operation type.

A process stream is defined as each individual combination of resin, application technique, and control technique.

Process streams within operations types are considered different from each other if any of the following characteristics vary;

(a) the neat resin plus monomer content;

(b) the application technique or;

(c) the control technique.

ii. The permittee shall calculate VOC emissions factors for each different process stream by using the appropriate equations in table 1 to Subpart WWWW of 40 CFR 63 for open molding (see d)(1)f.).

iii. The emission factor calculation should include any and all emission reduction techniques. If vapor suppressants are used to reduce VOC emissions, the permittee shall determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in appendix A to Subpart WWWW of 40 CFR part 63.

iv. If the calculated emission factor is less than or equal to the appropriate emission limit, the owner or operator has demonstrated that this process stream complies with the emission limit in table 2 of OAC rule 3745-21-25.

It is not necessary that all process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin being used, if any of the process streams that include that resin are to be used in any averaging calculations described in d)(2)b. d)(2)c. or d)(2)d., then all process streams using that individual resin shall be included in the averaging calculations.

If after the permittee has initially demonstrated that a specific combination of an individual resin and application method meets an applicable emission limit, and the resin changes or the monomer content increases, or the permittee changes the application method, then the permittee again shall demonstrate that the individual resin meets its emission limit as specified above. If any of the previously mentioned changes results in a situation where an individual resin exceeds its applicable emission limit in table 2 of OAC rule 3745-21-25, the permittee shall begin collecting resin use records and calculate compliance using one of the averaging options in d)(2)b. d)(2)c. or d)(2)d. on a twelve-month rolling average.

b. Demonstrate that, on average, the individual VOC emissions limits for each unique combination of operation type and resin application method shown in table 2 of OAC rule 3745-21-25 that applies to the facility are met.

i. Group the process streams described in table 2 of OAC rule 3745-21-25 by operation type and resin application method and then calculate a weighted average emission factor based on the amounts of each individual resin used for the last twelve months.

To do this, sum the product of each individual VOC emissions factor calculated in paragraph d)(1)f. of this rule and the amount of neat resin plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus used in that operation type as shown in the following equation;.

$$\text{Average Organic HAP Emissions Factor} = \frac{\sum_{i=1}^{n} (\text{Actual Process Stream EF}_i \times \text{Material}_i)}{\sum_{i=1}^{n} \text{Material}_i}$$

where:

Actual Process Stream EFi = actual VOC emissions factor for process stream i, pounds of VOC per ton of neat resin plus.

Materiali = the amount of neat resin plus or neat gel coat plus used during the last twelve calendar months for process stream i, in tons.

n = number of process streams where the permittee calculated a VOC emissions factor.

ii. The owner or operator may, but is not required to, include process streams where the owner or operator has demonstrated compliance as described in d)(2)a., subject to the limitations described in paragraph d)(2)a.iv. and the permittee is not required to and should not include process streams for which the will demonstrate compliance using the procedures in paragraph d)(2)d.

iii. Compare each VOC emissions factor calculated in paragraph d)(2)(b.i. with its corresponding VOC emissions limit in table 2 of OAC rule 3745-21-25. If all emissions factors are equal to or less than their corresponding emission limits, then the operation is in compliance.

c. Demonstrate each month that each weighted average of the VOC emissions limits in table 2 of OAC rule 3745-21-25 that apply are being met. When using this option, the permittee shall demonstrate compliance with the weighted average VOC emissions limit for all open molding operations.

i. Each month calculate the weighted average VOC emissions limit for all open molding operations for the facility for the last twelve-month period to determine the VOC emissions limit the owner or operator shall meet.

To do this, multiply the individual VOC emissions limits in table 2 of OAC rule 3745-21-25 for each open molding operation type by the amount of neat resin plus used in the last twelve months for each open molding operation type, sum these results, and then divide this sum by the total amount of neat resin plus used in open molding over the last twelve months as shown in the following equation:

$$\text{Weighted Average VOC Emission Limitation} = \frac{\sum_{i=1}^{n} (EL_i \times Material_i)}{\sum_{i=1}^{n} Material_i}$$

where:

ELi = VOC emissions limit for operation type i, pounds per ton from table 2 of OAC rule 3745-21-25.

$Material_i$ = amount of neat resin plus used during the last twelve-month period for operation type i, tons.

n = number of operations

ii. Each month calculate the weighted average VOC emissions factor for open molding

To do this, multiply the actual open molding operation VOC emissions factors calculated in paragraph d)(2)(a.ii. of this rule and the amount of neat resin plus used in each open molding operation type, sum the results, and divide this sum by the total amount of neat resin plus used in open molding operations as shown in the following equation

$$\text{Actual Weighted Average VOC Emissions Factor} = \frac{\sum_{i=1}^{n} (\text{Actual Operation } EF_i \times Material_i)}{\sum_{i=1}^{n} Material_i}$$

where:

Actual Operation EFi = Actual VOC emissions factor for operation type i, pounds of VOC per ton of neat resin plus or neat gel coat plus.

$Material_i$ = amount of neat resin plus or neat gel coat plus used during the last twelve calendar months for operation type i, tons.

n = number of operations

iii. Compare the values calculated in d)(2)c.i and d)(2)c.ii. If each twelve-month rolling average VOC emissions factor is less than or equal to the corresponding twelve-month rolling average VOC emissions limit, then the operation is in compliance.

d. Meet the VOC emissions limit for one application method and use the same resins for all application methods of that resin type.

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

i. For any combination of manual resin application and/or mechanical resin application, the permittee may elect to meet the VOC emissions limit for any one of these application methods and use the same resin in all of the resin application methods listed in this paragraph.

ii. Table 4 of OAC rule 3745-21-25 presents the possible combinations based on the permittee selecting the application process that results in the highest allowable monomer content resin. If the resin's monomer content is below the applicable value shown in the table 4 of this rule, the resin is in compliance.

iii. The owner or operator may also use a weighted average monomer content for each application method described in d)(2)d.i. Calculate the weighted average monomer content monthly. Use the equation in d)(2)b.i. except substitute monomer content for VOC emissions factor. The operation is in compliance if the weighted average monomer content based on the last twelve months of resin use is less than or equal to the applicable monomer contents in the table 4 of OAC rule 3745-21-25.

iv. The permittee may simultaneously use the averaging provisions in d)(2)b. or d)(2)c. to demonstrate compliance for any operations and/or resins the owner or operator does not include in the compliance demonstrations in d)(2)d.i. and d)(2)d.ii. However, any resins for which the permittee claims compliance under the option in d)(2)d.i. and d)(2)d.ii. shall not be included in any of the averaging calculations described in d)(2)b. or d)(2)c.

v. The owner or operator does not have to keep records of resin use for any of the individual resins where the owner or operator demonstrates compliance under the option in d)(2)d.i. unless the owner or operator elects to include that resin in the averaging calculations described in d)(2)d.ii.

vi. If the permittee is averaging monomer contents to meet any monomer content limits specified in table 4 of OAC rule 3745-2125, the permittee shall collect and keep records of resin use, monomer content, and operation where the resin is used.

(3) The permittee shall demonstrate continuous compliance with each VOC control requirement that applies to the affected operations according to the following methods:

a. Compliance with VOC emissions limits is demonstrated by maintaining a VOC emissions factor value less than or equal to the appropriate VOC emissions limit listed in table 2 of OAC rule 3745-21-25, on a twelve-month rolling average (see d)(2)b. or d)(2)c.) and/or by including in each compliance report a statement that individual resins and gel coats, as applied (as described in d)(2)a., meet the appropriate VOC emissions limit.

b. Compliance with monomer content limits in table 4 of OAC rule 3745-21-25 is demonstrated by maintaining an average monomer content value less than or equal to the appropriate monomer contents listed in table 4 of this rule, on a twelve-month rolling average (see d)(2)d., and/or by including in each compliance report a statement that resins and gel coats individually meet the appropriate monomer content limits.

(4) The permittee shall keep the following records:

a. A copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status.

b. Copies of all data, assumptions and calculations used to determine monomer contents, VOC emissions factors in d)(2)a through d)(2)d.

All records shall be retained by the owner or operator for a period of not less than five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record and shall be made available to the director or any authorized representative of the director for review during normal business hours.

(5) The permit to install for emissions units P001, P002, and P003 was evaluated based on the actual materials and the design parameters of the emissions units exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions units, i.e., "**X**" hours per day and "**Y**" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Styrene
TLV (mg/m^3): 85.202
Maximum Hourly Emission Rate (pounds/hour): 0.46
Predicted 1-Hour Maximum Ground-Level Concentration ($\mu g/m^3$): 710
MAGLC ($\mu g/m^3$): 2,028

The permittee, has demonstrated that emissions of styrene, from emissions unit P001, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(6) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

If the permittee determines that the "Toxic Air Contaminant Statute" 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 a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

(7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration

e) Reporting Requirements

(1) The permittee shall submit semiannual compliance status reports containing the following information:

a. Company name and address.

b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

c. Date of the report and beginning and ending dates of the reporting period.

d. If there are no deviations from any VOC emissions limitations and operating limits that apply and there are no deviations from the applicable work practice standards in table 1 of OAC rule 3745-21-25, a statement that there were no deviations from VOC emissions limitations, operating limits, or work practice standards during the reporting period.

e. For each deviation from a VOC emissions limitation or operating limit and for each deviation from a work practice standard that occurs, the compliance report shall contain the following information:

i. The total operating time of each affected operation during the reporting period.

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

f. If the permittee has changed compliance options (in d)(2)a. through d)(2)d.) since the last compliance report, the permittee shall state in the compliance report the date when the change occurred and the compliance option that was implemented.

Each compliance report shall cover the semiannual reporting period from January 1st through June 30th or the semiannual reporting period from July 1st through December 31st of each year. The semiannual compliance reports shall be submitted no later than thirty calendar days after the end of each six-month period to the appropriate Ohio EPA district office or local air agency.

The first compliance report shall cover the period beginning upon the date of issuance of this permit and ending on June 30th or December 31st, whichever date is the first.

(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 e-Business 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.

(3) The permittee shall submit annual reports that specify the total VOC and OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Synthetic Minor Title V Fee Emission Report.

(4) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than April 15 following the end of each calendar year.

f) Testing Requirements

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

a. Emission Limitation –

Emissions units P001 and P002:

The VOC emissions from each emissions unit shall not exceed 12.9 pounds/day.

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum daily resin usage rate (0.0474 ton per day) by the maximum emission factor of 215 pounds VOC (styrene) per ton of resin as determined according to the equations of 40 CFR Part 63 Subpart WWWW plus 2.74 pounds/day based on the maximum catalyst usage rate of 2.84 pounds of catalyst per day and a VOC content of 96.5 percent by weight.

b. Emission Limitation -

The VOC emissions from this emissions unit shall not exceed 2.36 tons per year, excluding cleanup.

Applicable Compliance Method -

This emissions limit is based on 365 days of operation per year. Therefore, compliance with the daily emissions limit will also ensure compliance with this emissions limit.

c. Emission Limitation -

Emissions unit P003:

The VOC emissions from this emissions unit shall not exceed 11.0 pounds/day.

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum daily resin usage rate (0.0745 ton per day) by the maximum emission factor of 90.1 pounds VOC (styrene) per ton of resin as determined according to the equations of 40 CFR Part 63 Subpart WWWW plus 4.31 pounds/day based on the maximum catalyst usage rate of 4.47 pounds of catalyst per day and a catalyst VOC content of 96.5 percent by weight.

d. Emission Limitation -

The VOC emissions from this emissions unit shall not exceed 2.01 tons per yearpounds, excluding cleanup.

Applicable Compliance Method -

This emissions limit is based on 365 days of operation per year. Therefore, compliance with the daily emissions limit will also ensure compliance with this emissions limit.

e. Emissions Limitation –

VOC emissions limitations of Table 2 from OAC rule 3745-21-25.

Applicable Compliance Method –

Compliance is based on the monitoring and record keeping requirements of d)(1) through d)(4).

g) Miscellaneous Requirements

(1) None.