



11/20/2013

Monica Schmelzer
SCHMELZER INDUSTRIES, INC.
7970 Wesley Chapel Rd.
P.O. Box 249
Somerset, OH 43783

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0664000064
Permit Number: P0114981
Permit Type: Initial Installation
County: Perry

Certified Mail

Table with 2 columns: Yes/No and various permit categories like TOXIC REVIEW, SYNTHETIC MINOR TO AVOID MAJOR NSR, etc.

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued...

Andrew Hall and Ohio EPA DAPC, Southeast District Office
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215
2195 Front Street
Logan, OH 43138

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-SEDO; West Virginia

PUBLIC NOTICE

11/20/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

SCHMELZER INDUSTRIES, INC.

7970 Wesley Chapel Road, P. O. Box 249

Somerset, OH 43783

Perry County

FACILITY DESC.: Broadwoven Fabric Mills

PERMIT #: P0114981

PERMIT TYPE: Initial Installation

PERMIT DESC: This FEPTIO is to obtain a facility-wide synthetic minor to avoid Title V requirements and to install 5 new forming drums.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Mykal Mercer, Ohio EPA DAPC, Southeast District Office, 2195 Front Street, Logan, OH 43138. Ph: (740)385-8501



Permit Strategy Write-Up

Check all that apply:

Synthetic Minor Determination

Netting Determination

1. Source Description:
This FEPTIO is for five new forming drums.
2. Facility Emissions and Attainment Status:
Schmelzer Industries, Inc. is a fiber glass manufacturing facility located at 7970 Wesley Chapel Road in Somerset, Ohio (Perry County), which is currently in attainment for all criteria pollutants. This facility is not located in an Appendix A area. This facility is an area source for HAPs (all of which are styrene) and other criteria pollutants. With addition of five new forming drums, uncontrolled emissions would exceed TV thresholds for HAP.
3. Source Emissions:
The facility is requesting facility-wide federally enforceable restrictions on all emissions units to avoid being a major Title V source by limiting single or combined HAP emissions below 10 TPY (9.9 TPY, as a rolling, 12-month summation).
4. Conclusion:
The emission limitations, monitoring, and record keeping requirements in this permit are sufficient to restrict the source below major source thresholds.
5. Please provide additional notes or comments as necessary:
None
6. Total Permit Allowable Emissions Summary (for informational purposes only):

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| OC | 14.45 |
| styrene | 9.9 (facility-wide) |
| PE | 3.85 |
| CO | 0.50 |
| NO _x | 10.95 |



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
SCHMELZER INDUSTRIES, INC.**

| | |
|----------------|-----------------------------------|
| Facility ID: | 0664000064 |
| Permit Number: | P0114981 |
| Permit Type: | Initial Installation |
| Issued: | 11/20/2013 |
| Effective: | To be entered upon final issuance |
| Expiration: | To be entered upon final issuance |



**Division of Air Pollution Control
Permit-to-Install and Operate
for
SCHMELZER INDUSTRIES, INC.**

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Draft Permit-to-Install and Operate

SCHMELZER INDUSTRIES, INC.

Permit Number: P0114981

Facility ID: 0664000064

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0664000064
Application Number(s): A0041724
Permit Number: P0114981
Permit Description: This FEPTIO is to obtain a facility-wide synthetic minor to avoid Title V requirements and to install 5 new forming drums.
Permit Type: Initial Installation
Permit Fee: \$1,000.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/20/2013
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

SCHMELZER INDUSTRIES, INC.
7970 Wesley Chapel Road
P. O. Box 249
Somerset, OH 43783

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, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

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: P0114981

Permit Description: This FEPTIO is to obtain a facility-wide synthetic minor to avoid Title V requirements and to install 5 new forming drums.

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

Group Name: Glass fiber spinning units

| | |
|-----------------------------------|-------------------|
| Emissions Unit ID: | K014 |
| Company Equipment ID: | Spinning Unit #9 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | K015 |
| Company Equipment ID: | Spinning Unit #10 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | K016 |
| Company Equipment ID: | Spinning Unit #11 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | K017 |
| Company Equipment ID: | Spinning Unit #12 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | K018 |
| Company Equipment ID: | Spinning Unit #13 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |



Draft Permit-to-Install and Operate
SCHMELZER INDUSTRIES, INC.
Permit Number: P0114981
Facility ID: 0664000064
Effective Date: To be entered upon final issuance

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 Ohio EPA DAPC, Southeast 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 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 being permanently shut down without first applying for and obtaining a permit pursuant to 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.



Draft Permit-to-Install and Operate
SCHMELZER INDUSTRIES, INC.
Permit Number: P0114981
Facility ID: 0664000064
Effective Date: To be entered upon final issuance

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) 4.b), 4.c), 4.d), 4.e), and 5.c).
 - 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) 2.a), 3.c), 4.a), 5.b), and 6.a).

2. Applicable Emissions Limitations and/or Control Requirements

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|---|---|
| a. | OAC rule 3745-31-05(D) (Synthetic minor restriction to avoid Title V requirements) | Emissions of any single hazardous air pollutant (HAP) or combined HAPs at the facility (emissions units K001-K008, K014-K018 and P001) shall not exceed 9.9 tons based on a rolling, 12-month summation. See 3.a) below. |

3. Operating Restrictions

- c) The maximum total material usage for emissions units K001-K008, K014-K018 and P001, combined, shall not cause total HAP or combined HAP emissions to exceed 9.9 tons as a rolling, 12-month summation based on the following equations:

$$(1) \quad Z = \sum_{i=1}^n (G)(HAP_T)/2,000\text{lbs}$$

Where:

Z= tons of HAP emissions per month;

G= monthly facility-wide usage of each HAP-containing material, in gallons;

HAP= total HAP or combined HAP content of each HAP-containing material, in pounds of total HAP or combined HAPs per gallon; and

n = total number of HAP-containing material; and

$$\sum_{i=1}^n (Z) \text{ is } \leq 9.9 \text{ tons total HAP or combined HAP, as a rolling 12-month summation}$$



Where:

n = months in the rolling, 12-month period.

The permittee has sufficient monthly records of HAP emissions to begin calculating the rolling, 12-month summations upon final issuance of this permit.

4. Monitoring and/or Recordkeeping Requirements

a) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP) that are applied in emissions units K001-K008, K014-K018 and P001, combined:

- (1) the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;
- (2) the name/identification of each individual HAP contained in each material applied (and identified in "(1)" above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;
- (3) the number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;
- (4) for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of "(2)" times "(3)" for all the materials applied during the month, divided by 2,000 pounds;
- (5) the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from "(4)" above;
- (6) for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in "(4)" above, for the present month plus the previous 11 months of operation, in ton(s); and
- (7) the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in "(5)" above, for the present month plus the previous 11 months of operation, in ton(s).

[Note: A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.]

b) The federally enforceable permit-to-install and operate (PTIO) applications for emissions units K001-K008, K014-K018 and P001 were evaluated based on the actual materials and the design parameters of the emissions units' exhaust systems, as specified by the permittee. 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 emitted at over one ton per year using



an air dispersion model such as SCREEN3, 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:

- (1) 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 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):
 - a. 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
 - b. 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.
- (2) The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- (3) This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" 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):

$$TLV(ug/m^3)/10 \times 8/24 \times 5/7 = 4 TLV(ug/m^3)/(24 \times 7) = MAGLC$$

- (4) The following summarizes the results of dispersion modeling for the or "worst case" toxic contaminant(s):

Toxic Contaminant: styrene

TLV (mg/m³): 886,852

Maximum Hourly Emission Rate (lbs/hr): 2.26

Predicted 1-Hour Maximum Ground Level Concentration (ug/m³): 572

MAGLC (ug/m³): 2,063

The permittee has demonstrated that emissions of styrene from emissions units K001-K008, K014-K018 and P001 are 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).

- c) 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:
- (1) 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;
 - (2) 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
 - (3) 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", the permittee shall apply for and obtain a final PTI, PTIO, or FEPTIO (as applicable) prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- d) 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):
- (1) 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.);
 - (2) 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);
 - (3) 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



- (4) 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.
- e) 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.

5. Reporting Requirements

- a) 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.
- b) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - (1) 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:
 - a. Total HAP or combined HAP emissions from the facility shall not exceed 9.9 tons based on a rolling, 12-month summation.
 - (2) the probable cause of each deviation (excursion);
 - (3) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - (4) the magnitude and duration of each deviation (excursion).

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, 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).

- c) The permittee shall include 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 groundlevel concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions units, or the exhaust stacks have been made, then the report shall include a statement to this effect.



6. Testing Requirements

a) Emissions Limitations:

Emissions of any single hazardous air pollutant (HAP) or combined HAPs from HAP-containing material use at the facility (emissions units K001-K008, K014-K018 and P001) shall not exceed 9.9 tons based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with these emissions limitations shall be demonstrated by the recordkeeping in (4)a.

7. Miscellaneous Requirements

a) None.



Draft Permit-to-Install and Operate
SCHMELZER INDUSTRIES, INC.
Permit Number: P0114981
Facility ID: 0664000064
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. **Emissions Unit Group - Glass fiber spinning units: K014, K015, K016, K017 and K018. Each has a maximum resin usage of 7.5 pounds per hour and all are enclosed in a building. This is an initial installation.**

| EU ID | Operations, Property and/or Equipment Description |
|--------------|--|
| K014 | Glass fiber spinning unit No. 9 |
| K015 | Glass fiber spinning unit No. 10 |
| K016 | Glass fiber spinning unit No. 11 |
| K017 | Glass fiber spinning unit No. 12 |
| K018 | Glass fiber spinning unit No. 13 |

- 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)d.

- 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), as effective 11/30/01 | <p>Organic compound (OC) emissions shall not exceed 0.24 ton per month, averaged over a rolling, 12-month period.</p> <p>Nitrogen oxides (NO_x) emissions shall not exceed 0.18 ton per month, averaged over a rolling, 12-month period.</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.008 ton per month, averaged over a rolling, 12-month period.</p> <p>Particulate emissions (PE) shall not</p> |



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|---|---|
| | | exceed 0.06 ton per month, averaged over a rolling, 12-month period. See b)(2)a. below |
| b. | OAC rule 3745-31-05(C), as effective 12/01/06 | See b)(2)b. below. |
| c. | OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06 | See b)(2)c. below. |
| d. | OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V applicability) | See Section B.2.a. above. |
| e. | OAC rule 3745-17-07(B) and 3745-17-08(B) | See b)(2)d. below. |

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

P0114981 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. OC emissions for each emissions unit shall not exceed 0.24 ton per month, averaged over a rolling, 12-month period.

- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, NO_x and CO emissions from this air contaminant



source since the uncontrolled potential to emit for PE, NO_x and CO is less than 10 tons/yr.

d. This facility is located in Perry County, which is not identified in Appendix A of OAC rule 3745-17-08. Therefore, the fugitive dust emissions from this emissions unit are exempt from the fugitive dust control requirements and visible emission limitation established in OAC rules 3745-17-08(B) and 3745-17-07(B), respectively.

e. The OC emissions from the resin material employed in this emissions unit consists of styrene, a hazardous air pollutant (HAP).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each month for each forming drum:

a. the total potential (prior to applying the booth/oven "split") uncontrolled monthly organic compound emission rate for all coatings employed in the coating operation associated with this emissions unit, multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in condition d)(2) of this permit), in pounds per month; and

b. the total potential (prior to applying the booth/oven "split") uncontrolled rolling, 12-month summation for all coatings employed in the coating operation associated with this emissions unit, multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in condition d)(2) of this permit), in pounds per hour for each hour of the day.

(2) For purposes of calculating the organic compound emission rates for this emissions unit and the associated oven (P001), the permittee shall utilize a value of 85% as the maximum percentage of the organic compounds employed in the forming drums that are emitted uncontrolled from the forming drums. The remaining 15% of the organic compounds employed in the forming drums shall be considered to be the uncontrolled emissions for the oven. This "split" of organic compound emissions between this emissions unit and the associated oven is based upon "Partitioning of total emissions by emission phase" found on page 15 of "The Technical Discussion of Unified Emission Factors for Open Molding of Composites". (July 23, 2001 or the most recent update).

(3) See Section B.4. for the facility-wide recordkeeping requirements.

e) Reporting Requirements

(1) 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.



(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) See Section B.5.b) and c) for the facility-wide reporting requirements.

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. Emissions Limitation:

OC emissions shall not exceed 0.24 ton per month, averaged over a rolling, 12-month period.

Applicable Compliance Method:

Compliance with the ton per month, averaged over a rolling, 12-month period emission limitation shall be demonstrated based on the following calculations from the information presented in the permittee's application and upon the recordkeeping requirements under d)(1):

Maximum emission factor, in pounds of styrene per ton of resin processed = 207

[The emissions factor is found in the Unified Emission Factor (UEF) Table 3, found in the "The Technical Discussion of Unified Emission Factors for Open Molding of Composites" (July 23, 2001 or the most recent update) and is based on using mechanical atomized controlled spray and resin containing 44% styrene. If a higher styrene content resin is to be used, it will utilize vapor-suppression or other emission reduction technology and the resulting emission factor will be less than 207.]

$(207 \text{ lbs styrene/ton resin processed})(0.00375 \text{ ton resin processed/hr})(85\% \text{ of emissions emitted from fiber spinning unit}) = 0.66 \text{ lbs styrene/hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton}/2,000 \text{ lbs} = 2.89 \text{ tons per year} / 12 \text{ months/yr} = 0.24 \text{ ton/month, averaged over a rolling, 12-month period.}$

[Note that the 85% emissions split comes from a combination of the "Spray application" and "Roll-out" emissions phases under mechanical application as detailed in "Partitioning of total emissions by emission phase" found on page 15 of "The Technical Discussion of Unified Emission Factors for Open Molding of Composites". (July 23, 2001 or the most recent update)]

b. Emissions Limitations:

NO_x emissions shall not exceed 0.18 ton per month, averaged over a rolling, 12-month period.



Applicable Compliance Method:

Compliance with the ton per month, averaged over a rolling, 12-month period emission limitation shall be demonstrated based on the following calculations from the information presented in the permittee's application:

Emission factors, respectively: $20 + 0 = 20 \text{ lbsNO}_x/\text{ton material processed}$

[Emission factors from AP 42, Table 11.13-4 for the unit melter furnace (SCC 3-05-012-13) and the forming process (SCC 3-05-012-14)]

$(20 \text{ lbsNO}_x/\text{ton material processed})(0.025 \text{ ton material processed/hr}) = 0.50 \text{ lbNO}_x/\text{hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton}/2,000 \text{ lbs} = 2.19 \text{ tons per year} / 12 \text{ months/yr} = 0.18 \text{ ton/month}$, averaged over a rolling, 12-month period.

c. Emissions Limitations:

CO emissions shall not exceed 0.008 ton per month, averaged over a rolling, 12-month period.

Applicable Compliance Method:

Compliance with the ton per month, averaged over a rolling, 12-month period emission limitation shall be demonstrated based on the following calculations from the information presented in the permittee's application:

Emission factors, respectively: $0.9 + 0 = 0.9 \text{ lb CO/ton material processed}$

[Emission factors from AP 42, Table 11.13-4 for the unit melter furnace (SCC 3-05-012-13) and the forming process (SCC 3-05-012-14)]

$(0.9 \text{ lb CO/ton material processed})(0.025 \text{ ton material processed/hr}) = 0.023 \text{ lb CO/hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton}/2,000 \text{ lbs} = 0.10 \text{ ton per year} / 12 \text{ months/yr} = 0.008 \text{ ton/month}$, averaged over a rolling, 12-month period.

d. Emissions Limitation:

PE shall not exceed 0.06 ton per month, averaged over a rolling, 12-month period.

Applicable Compliance Method:

Compliance with the ton per month, averaged over a rolling, 12-month period emission limitation shall be demonstrated based on the following calculations from the information presented in the permittee's application:

Emission factors, respectively: $6 + 1 = 7 \text{ lbs PE/ton material processed}$

[Emission factors from AP 42, Table 11.13-2 for the unit melter furnace (SCC 3-05-012-13) and the forming process (SCC 3-05-012-14)]



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$(7 \text{ lbs PE/ton material processed})(0.025 \text{ ton material processed/hr}) = 0.175 \text{ lb PE/hr}$
 $\text{PE/hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton}/2,000 \text{ lbs} = 0.77 \text{ ton per year} / 12 \text{ months/yr} = 0.06$
ton/month, averaged over a rolling, 12-month period.

g) Miscellaneous Requirements

(1) None.