

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Interim Director

2/19/2014

Certified Mail

Mr. John Padget
Iten Industries Inc. (Plant 3)
P.O. Box 2150
Ashtabula, OH 44005-2150

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0204010442
Permit Number: P0116134
Permit Type: Administrative Modification
County: Ashtabula

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. 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 PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171 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: U.S. EPA
Ohio EPA-NEDO; Pennsylvania; Canada



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Iten Industries Inc. (Plant 3)**

Facility ID:	0204010442
Permit Number:	P0116134
Permit Type:	Administrative Modification
Issued:	2/19/2014
Effective:	2/19/2014



Division of Air Pollution Control
Permit-to-Install
for
Iten Industries Inc. (Plant 3)

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Final Permit-to-Install
Iten Industries Inc. (Plant 3)
Permit Number: P0116134
Facility ID: 0204010442
Effective Date: 2/19/2014

Authorization

Facility ID: 0204010442
Facility Description: Fiberglass reinforced plastic manufacturing
Application Number(s): M0002562
Permit Number: P0116134
Permit Description: This administrative permit modification is to address changes from the revision of OAC rule 3745-21-07 and newly promulgated OAC rule 3745-21-25 and remove language for cleanup.
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 2/19/2014
Effective Date: 2/19/2014

This document constitutes issuance to:

Iten Industries Inc. (Plant 3)
1303 West 38th Street
Ashtabula, OH 44004

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

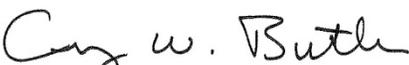
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Interim Director



Authorization (continued)

Permit Number: P0116134

Permit Description: This administrative permit modification is to address changes from the revision of OAC rule 3745-21-07 and newly promulgated OAC rule 3745-21-25 and remove language for cleanup.

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

Emissions Unit ID:	P009
Company Equipment ID:	Politen Mix Unit No.1
Superseded Permit Number:	02-20074
General Permit Category and Type:	Not Applicable

Group Name: Pultrusion units

Emissions Unit ID:	P001
Company Equipment ID:	Pultrusion Unit No. 1
Superseded Permit Number:	02-20074
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	Pultrusion Unit No. 2
Superseded Permit Number:	02-20074
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	Pultrusion Unit No. 3
Superseded Permit Number:	02-20074
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	Pultrusion Unit No. 4
Superseded Permit Number:	02-20074
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	Pultrusion Unit No. 5
Superseded Permit Number:	02-20074
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	Pultrusion Unit No. 6
Superseded Permit Number:	02-20074
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P007
Company Equipment ID:	Pultrusion Unit No. 7
Superseded Permit Number:	02-20074
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Iten Industries Inc. (Plant 3)
Permit Number: P0116134
Facility ID: 0204010442
Effective Date: 2/19/2014

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted



local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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



8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the



Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

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

12. Permit-To-Operate Application

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



13. Construction Compliance Certification

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

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



Final Permit-to-Install
Iten Industries Inc. (Plant 3)
Permit Number: P0116134
Facility ID: 0204010442
Effective Date: 2/19/2014

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. The following emissions units as well as containers storing HAP-containing materials are subject to 40 CFR Part 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants for Major Sources: Reinforced Plastic Composites Production): P001 – P007 and P009. The complete MACT requirements, including the MACT General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website: <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA, Northeast District.
3. 40 CFR, Part 63, Subpart WWWW – Operational Restrictions for the facility-wide work practice standards:
 - a) For all fiberglass reinforced plastic operations, the permittee must keep all containers that store HAP-containing materials closed or covered, except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
4. 40 CFR, Part 63, Subpart WWWW – Monitoring and/or Recordkeeping Requirements for facility-wide work practice standards:
 - a) The permittee shall perform daily inspections when in operation of all containers that store HAP-containing materials, and record the following information:
 - (1) the date and reason why any required inspection was not performed;
 - (2) the date and all times when containers that store HAP-containing materials were not closed or covered, except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety; and
 - (3) information on the duration and cause of each deviation and the corrective action taken.
5. 40 CFR, Part 63, Subpart WWWW – Reporting Requirements for facility-wide work practice standards:
 - a) The permittee must submit the following semiannual compliance reports:
 - (1) if there are no deviations from this work practice standard in B.4.a), provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., all containers that store HAP-containing materials were closed or covered during the reporting period); and
 - (2) if there were deviations with this work practice standard in B.4.a), provide the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These



compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

7. The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart WWWW, including the following sections:

§63.5915(a)	copy of compliance notification(s) and report(s)
§63.5915(d)	certified statement of compliance with work practice requirements
§63.5920(a) – (d)	record keeping format and retention requirements

8. The following emissions units as well as containers storing HAP-containing materials are subject to OAC rule 3745-21-25 (Control of VOC emissions from reinforced plastic composites production operations): P001 – P007 and P009.

9. OAC rule 3745-21-25 – Operational Restrictions for the facility-wide work practice standards:

- a) For all fiberglass reinforced plastic operations, the permittee must keep all 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.

10. OAC rule 3745-21-25 – Monitoring and/or Recordkeeping Requirements for facility-wide work practice standards:

- a) The permittee shall perform daily inspections when in operation of all containers that store VOC-containing materials, and record the following information:
 - (1) the date and reason why any required inspection was not performed;
 - (2) the date and all times when containers that store VOC-containing materials were not closed or covered, except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety; and
 - (3) information on the duration and cause of each deviation and the corrective action taken.

11. OAC rule 3745-21-25 – Reporting Requirements for facility-wide work practice standards:

- a) The permittee must submit the following semiannual compliance reports:
 - (1) if there are no deviations from the work practice standard in B.9.a), provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., all containers that store VOC-containing materials were closed or covered during the reporting period); and
 - (2) if there were deviations with the work practice standard in B.9.a), provide the total operating time of each emissions unit during the reporting period and information on the



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

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

12. The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25, including the following sections:

OAC rule 3745-21-25(P)(1)(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
OAC rule 3745-21-25(P)(1)(e)	a certified statement that operations are in compliance with the work practice standards specified in Table 1 of OAC rule 3745-21-25, as applicable.
OAC rule 3745-21-25(P)(4)	record keeping retention requirements



Final Permit-to-Install
Iten Industries Inc. (Plant 3)
Permit Number: P0116134
Facility ID: 0204010442
Effective Date: 2/19/2014

C. Emissions Unit Terms and Conditions



1. P009, Politen Mix Unit No.1

Operations, Property and/or Equipment Description:

Cowels Mixer No. 1, with a fabric filter for dust collection.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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)	Volatile organic compounds (VOC) emissions shall not exceed 1,216 lbs/month and 7.3 tons/year. Particulate emissions (PE) shall not exceed 0.012 lb/hr and 0.05 ton/year. Visible particulate emissions from any stack shall not exceed 5% opacity as a 6-minute average. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW, as specified in c)(1).
b.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(1)a, c)(1)b and c)(1)c.
c.	40 CFR Part 63.1 – 63.15 (40 CFR 63.5925)	Table 15 to Subpart WWWW – Applicability of General Provisions, Subpart A.
d.	OAC rule 3745-21-25(D)	Work practice standards in Table 1 of OAC rule 3745-21-25. See c)(1)a, c)(1)b and c)(1)c.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-07(A)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The permittee shall operate the particulate control, fabric filter system whenever this emissions unit is in operation.

c) Operational Restrictions

(1) The permittee shall meet the following work practice standards:

- a. use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;
- b. close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and
- c. keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart WWWW, including the following sections:

63.5915(a)	copy of compliance notification(s) and report(s)
63.5915(d)	certified statement of compliance with work practice requirements
63.5920(a) – (d)	record keeping format and retention requirements

(2) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25, including the following sections:



OAC rule 3745-21-25(P)(1)(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
OAC rule 3745-21-25(P)(1)(e)	a certified statement that operations are in compliance with the work practice standards specified in Table 1 of OAC rule 3745-21-25, as applicable.
OAC rule 3745-21-25(P)(4)	record keeping retention requirements

- (3) The permittee shall maintain the following monthly records for each emissions unit:
- a. the company identification for each resin paste;
 - b. pounds of each resin paste mixed;
 - c. the weight percent of available VOC monomer (e.g., styrene, methyl methacrylate) for each resin paste mixed; and
 - d. the total VOC emission rate for all resin paste mixed, as calculated by the following equation, in pounds per month:

$$\text{VOC} \left(\frac{\text{lbs}}{\text{month}} \right) = \sum_i^n [(W)(P)]_i \times \text{EF}$$

where:

W = the weight of each resin applied, as recorded in d)(3)b);
 P = the percent of available VOC monomer, by weight, of each resin paste, as recorded in d)(3)c);
 i = pounds of available VOC monomer in each resin paste, i, mixed;
 n = number of resin paste mixed; and
 EF = each emission factor.

EF = emission factor of 0.25%. The emission factor of 0.25% of available HAP (VOC monomer) is taken from Table 5-2, "Average HAP emission Equations by Process" in US EPA's document "Hazardous Air Pollutant Emissions from the Production of Reinforced Plastic Composites Backgrounds Information Document for Proposed Standards"

- (4) The permittee shall perform daily inspections of the mixer when resin is present in the mixing vessel, and record the following information:
- a. the date and reason why any required inspection was not performed;



- b. the date and all times the mixer cover was not closed over the mixing vessel, when actual mixing is occurring, except when adding materials or changing covers to the mixing vessel;
- c. the date and all times the mixer vents were not closed over the mixing vessel, when actual mixing is occurring, except that venting is allowed during additions of materials, or as necessary prior to adding materials or opening the cover for safety;
- d. the date and all times when visible gaps were present in the mixer cover, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation when the mixer cover was properly employed; and
- e. information on the duration and cause of each deviation and the corrective action taken.

e) Reporting Requirements

(1) The permittee must submit semiannual compliance reports:

- a. if there are no deviations from the work practice standards in c)(1)a – c)(1)c, provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., (1) used mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch were permissible around mixer shafts and any required instrumentation; (2) closed any mixer vents when actual mixing was occurring, except that venting was allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and (3) kept the mixer covers closed while actual mixing was occurring except when adding materials or changing covers to the mixing vessels.); and
- b. if there were any deviations with the work practice standards in c)(1)a, c)(1)b or c)(1)c, provide the total operating time of the emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each month when the VOC emissions exceeded the 1,216 pounds per month limit, and the actual VOC emissions for each such month.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.



- (3) The permittee shall notify the Ohio EPA, Northeast District Office in writing of any daily record showing that the fabric filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Northeast District Office within 30 days after the event occurs.
 - (4) The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

VOC emissions shall not exceed 1,216 lbs/month and 7.3 tons/year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3) of these terms and conditions.

The annual emission limitation was developed by multiplying the monthly VOC emission limitation (1,216 lbs/month) by 12 months per year, and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the monthly allowable emission limitation, compliance is demonstrated with the annual emission limitation.
 - b. Emission Limitation:

PE shall not exceed 0.012 lb/hr and 0.05 ton/year.

Applicable Compliance Method:

If required, compliance with the allowable particulate emissions limit shall be determined in accordance with the following method(s): Methods 1-4, and Method 5 of 40 CFR part 60, Appendix A.

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.012 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.
 - c. Opacity Limitation:

Visible particulate emissions from any stack shall not exceed 5% opacity as a 6-minute average.



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Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

- (1) None.



2. Emissions Unit Group - Pultrusion units: P001, P002, P003, P004, P005, P006, and P007

EU ID	Operations, Property and/or Equipment Description
P001	Pultrusion Unit No. 1, equipped with a cut-off saw, and a common baghouse.
P002	Pultrusion Unit No. 2, equipped with a cut-off saw, and a common baghouse.
P003	Pultrusion Unit No. 3, equipped with a cut-off saw, and a common baghouse.
P004	Pultrusion Unit No. 4, equipped with a cut-off saw, and a common baghouse.
P005	Pultrusion Unit No. 5, equipped with a cut-off saw, and a common baghouse.
P006	Pultrusion Unit No. 6, equipped with a cut-off saw, and a common baghouse.
P007	Pultrusion Unit No. 7, equipped with a cut-off saw, and a common baghouse.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Reduce total organic hazardous air pollutants (HAP) emissions by at least 60 weight percent as specified in 40 CFR 63.5805 and Table 3. See c)(1).
b.	40 CFR Part 63.1 – 63.16 (40 CFR 63.5925)	Table 15 to Subpart WWWW – Applicability of General Provisions, Subpart A.
c.	OAC rule 3745-21-25(D)	Reduce total volatile organic compounds (VOC) emissions by at least 60 percent by weight. See c)(1).
d.	OAC rule 3745-31-05(A)(3)	VOC emissions shall not exceed 1,216 lbs/month and 7.3 tons/year. Total particulate emissions (PE) from emission units P001 through P007 and P011, combined, shall not exceed 0.010 gr/dscf, 0.47 lb/hr and 2.1 tons/year.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW, as specified in c)(1).
e.	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-17-07(A)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) To demonstrate compliance with emissions limits in b)(1)a and b)(1)c for reducing emissions by at least 60 percent by weight, the permittee shall design, install and operate a wet area enclosure and resin drip collection system on each pultrusion machine that meet the criteria below:

The criteria for each pultrusion machine, with no radio frequency pre-mold heat unit, no direct die injection or preform injection system, are as follows:

- a. The enclosure must cover and enclose the open resin bath and the forming area in which reinforcements are pre-wet or wet-out and moving toward the die. The surfaces of the enclosure must be closed except for openings to allow material to enter and exit the enclosure.
- b. The enclosure must extend from the beginning of the resin bath to within 0.5 inch or less of the die entrance.
- c. The total open area of the enclosure must not exceed 2 (two) times the cross sectional area of the puller window and must comply with the following:
 - i. All areas which are open need to be included in the total open area calculation with the exception of access panels, door and/or hatches that are part of the enclosure.



- ii. The area which is displaced by entering reinforcement or exiting product is considered open.
- iii. Areas covered by brush covers are considered closed.
- d. Open areas for level control devices, monitoring devices, agitation shafts, and fill hoses must have no more than 1.0 inch clearance.
- e. The access panels, doors, and/or hatches that are part of the enclosure must close tightly. Damaged access panels, doors, and/or hatches that do not close tightly must be replaced.
- f. The enclosure may not be removed from the pultrusion line, and access panels, doors, and/or hatches that are part of the enclosure must remain closed whenever resin is in the bath, except for the following periods of time in c)(1)g of this section.
- g. The maximum length of time the enclosure may be removed from the pultrusion line or the access panels, doors, and/or hatches and may be open is:
 - i. 30 minutes per any 8 hour shift;
 - ii. 45 minutes per any 12 hour shift; or
 - iii. 90 minutes per any day, if the machine operates 24 hours in a day.

The time restrictions do not apply if the open doors or panels do not cause the limit of two times the puller window area to be exceeded.

The facility may average the times that access panels, doors, and/or hatches are open across all operating lines. In that case the average must not exceed the times shown above. All lines included in the average must have operated the entire time period being averaged.

- h. No fans, blowers, and/or air lines may be allowed within the enclosure. The enclosure must not be ventilated.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart WWWW, including the following sections:

63.5895(c)	records of resin and gel coat use, organic HAP content and operation where resin is used
63.5915(a)	copy of compliance notification(s) and report(s)



63.5915(c)	records of all calculations and data used to determine organic HAP emissions factors or average organic HAP contents for operations and application methods as specified under 63.5810
63.5920(a) – (d)	record keeping format and retention requirements

(2) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25, including the following sections:

OAC rule 3745-21-25(O)(2)(b)	records of resin and gel coat use, monomer content and operation where it was used
OAC rule 3745-21-25(P)(1)(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
OAC rule 3745-21-25(P)(1)(c)	for operations listed in tables 2, 3, and 4 of OAC rule 3745-21-25 all data, assumptions, and calculations used to determine monomer contents and VOC emissions factors
OAC rule 3745-21-25(P)(4)	record keeping retention requirements

(3) The permittee shall maintain the following monthly records for each emissions unit:

- a. the company identification for each resin applied;
- b. pounds of each resin applied;
- c. the weight percent of available VOC monomer (e.g., styrene and methyl methacrylate) for each resin applied;
- d. the total VOC emission rate for all resins applied, as calculated by the following equation, in tons/month:

$$\text{VOC (lb/month)} = (1 - 0.60) \times \left(\frac{1}{2000}\right) \times \sum_i^n [(W)(P)]_i \times \text{EF}$$

where:

- W = the weight of each resin applied, as recorded in d)(3)b;
- P = the percent of available VOC monomer, by weight, of each resin applied, as recorded in d)(3)c;
- i = pounds of available VOC monomer in each resin, i, applied;
- n = number of resins applied; and
- EF = each emissions factor.



EF = 0.04 lb of VOC emissions emitted / lb of available VOC monomer resin applied (US EPA's AP-42, Fifth Edition, Volume I Chapter 4: Evaporation Loss Sources, Section 4.4, Table 4.4-2. Emission Factors for Uncontrolled Polyester Resin Production Fabrication Processes, February 2007, or the use of an EF with the written approval from Ohio EPA).

0.60 = emissions reduction limit, by weight (The 0.60 VOC emissions reduction limit, by weight, is achieved by meeting the requirements in c)(1)).

Note: Available VOC monomers include all available VOC monomers and available organic HAP monomers in each resin as applied (e.g., styrene, vinyl toluene, methyl methacrylate, and etc.). The product [(W)(P)] is the amount of available VOC monomers, in pounds, of each resin mix produced.

- (4) The permittee shall inspect daily the wet area enclosure when there is resin present in the resin bath, and record the following information:
 - a. the date and reason why any required inspection was not performed;
 - b. the date and all times the enclosure was not in place over the resin bath and there was resin present in the resin bath;
 - c. the date and all times the enclosure's access panels, doors, hatches or covers were open and there was resin present in the resin bath;
 - d. the date and all times and cause(s) when the wet area enclosure and resin drip collection system did not meet each criterion in c)(1); and
 - e. information on the duration and cause of each deviation and the corrective action taken.

- (5) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a **weekly basis**. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is **between 1 to 5 inches of water**.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:



- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;



- b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
- c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
- d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. an identification of each month during which the VOC emissions from any of the emissions units exceeded 1,216 lbs/month, and the actual VOC emissions for each such month.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (3) The permittee must submit semiannual compliance reports:
 - a. If there were no deviations with the emissions limit of reducing total organic HAP emissions by at least 60 weight percent, provide a statement that there were no deviations with this emissions limit, i.e., the total organic HAP emissions were reduced by at least 60 weight percent because each pultrusion machine met the criteria in section c)(1) during the reporting period;
 - b. If there were deviations with the emissions limit of reducing total organic HAP emissions by at least 60 weight percent, provide the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken;
 - c. If there were no deviations with the emissions limit of reducing VOC emissions by at least 60 weight percent, provide a statement that there were no deviations with this emissions limit, i.e., VOC emissions were reduced by at least 60 weight percent because each pultrusion machine met the criteria in section c)(1) during the reporting period; and
 - d. If there were deviations with the emissions limit of reducing VOC emissions by at least 60 weight percent, provide the total operating time of each emissions unit



during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted by July 31 or January 31, respectively.

- (4) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

f) Testing Requirements

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

a. Emission Limitation:

Reduce total organic HAP emissions by at least 60 weight percent as specified in 40 CFR 63.5805 and Table 3.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(4) of these terms and conditions.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 18, 25, 25A, 204, 204A – F, 205 or other approved methods as appropriate.

b. Emission Limitation:

Reduce total VOC emissions by at least 60 percent by weight.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(4) of these terms and conditions.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 18, 25, 25A, 204, 204A – F, 205 or other approved methods as appropriate.



c. Emission Limitation:

VOC emissions shall not exceed 1,216 lbs/month and 7.3 tons/year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3) of these terms and conditions.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 204, 204A – F, 205 or other approved methods as appropriate.

The tpy emission limitation was developed by multiplying the monthly VOC emission limitation (1,216 lbs/month) by 12 months per year, and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

d. Emission Limitation:

PE from emission units P001 through P007 and P011, combined, shall not exceed 0.010 gr/dscf and 0.47 lb/hr.

Applicable Compliance Method:

The hourly PE limitation was established by multiplying the PE concentration limit of 0.010 gr/dscf at the exhaust of the baghouse by the gas flow rate from this emissions unit of 5,500 dscfm and by 60 minutes/hr, and then dividing by 7,000 grains per pound.

If required, compliance with the allowable particulate emissions limit shall be determined in accordance with the following method(s): Methods 1-4, and Method 5 of 40 CFR part 60, Appendix A.

e. Emission Limitation:

PE from emission units P001 through P007 and P011, combined, shall not exceed 2.1 tons/yr.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.47 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.



f. Opacity Limitation:

Visible particulate emissions from any stack shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.