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

4/11/2014

Certified Mail

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

Facility ID: 0204010442
Permit Number: P0109217
County: Ashtabula

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA)Preliminary Proposed Title V permit that was issued in draft form on 3/5/2014. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically 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. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA DAPC, Northeast District Office

Response to Comments

Facility ID:	0204010442
Facility Name:	Iten Industries Inc. (Plant 3)
Facility Description:	Fiberglass reinforced plastic manufacturing
Facility Address:	1303 West 38th Street Ashtabula, OH 44004 Ashtabula County
Permit:	P0109217, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Star Beacon on 03/06/2014. The comment period ended on 04/05/2014.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

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

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

1. Topic: None

a. Comment: None

b. Response: None

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Iten Industries Inc. (Plant 3)

Facility ID:	0204010442
Permit Number:	P0109217
Permit Type:	Renewal
Issued:	4/11/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Iten Industries Inc. (Plant 3)

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Authorization

Facility ID:	0204010442
Facility Description:	Fiberglass reinforced plastic manufacturing
Application Number(s):	A0043399
Permit Number:	P0109217
Permit Description:	Title V renewal permit for a fiberglass reinforced plastic manufacturer. Emissions units include pultrusion machines, mixers and a vertical saw for cutting profiles.
Permit Type:	Renewal
Issue Date:	4/11/2014
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0084160

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

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

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 Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northeast District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submittedscheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northeast District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northeast District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally

enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northeast District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

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.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. 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 reissuance, or modification, or for denial of a permit renewal application.

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 permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. 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, reopening 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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible

Officialthat, 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 paragraph (E) of OAC rule 3745-77-03.

(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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northeast District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northeast District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northeast District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible 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 Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11)))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theOhio 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

25. Records Retention RequirementsUnder State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine

whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northeast District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

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 ofan 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 Ohio EPA DAPC, Northeast District Office, 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 required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

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 insignificant emissions units are located at this facility:

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed below that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, 3745-21 and/or 40 CFR Part 60 or 63.

Emissions units: P019

[Authority for term: OAC rule 3745-77-07(A)(13), PTI P0116205]

3. **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, P009 and P019.** 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 appropriate Ohio EPA District or local air agency.

   [Authority for term: 40 CFR Part 63, Subpart WWWW and PTI P0116134]

4. 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.

      [Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart WWWW and PTI P0116134]

5. 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.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart WWWWand PTI P0116134]

6. 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.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart WWWW and PTI P0116134]

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

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW and PTI P0116134]

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, P009 and P019.**

[Authority for term: OAC rule 3745-21-25 and PTI P0116134]

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.

   [Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-21-25 and P0116134]

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.

   [Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25and PTI P0116134]

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.

   [Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25 and PTI P0116134]

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

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25 and PTI P0116134]

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) (PTI P0116134)	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 – 63.16 (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.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-21-25(D), 40 CFR Part 63, Subpart WWWW and PTI P0116134]

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

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW and PTI P0116134]

(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

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25 and PTI P0116134]

(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:

$$\text{VOC}\left(\frac{\text{lbs}}{\text{month}}\right) = \sum_{i}^{n}[(W)(P)]i \text{ x EF}$$

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”

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116134]

(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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116134]

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.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25(D), 40 CFR Part 63, Subpart WWWW and PTI P0116134]

(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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116134]

(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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116134]

(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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116134]

f) Testing Requirements

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

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

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

<u>Applicable Compliance Method</u>:

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116134]

b. <u>Emission Limitation</u>:

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116134]

c. 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).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116134]

g) Miscellaneous Requirements

(1) None.

2. P011, Vertical Saw

Operations, Property and/or Equipment Description:

Dog bone saw, with 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.	OAC rule 3745-31-05(A)(3) (PTI 02-22338)	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. See b)(2)a. Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average.
b.	OAC rule 3745-17-07(A)	The requirements of OAC rule 3745-17-07(A) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11(B)	The requirements of OAC rule 3745-17-11(B) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. Total PE shall not exceed 0.010 gr/dscf, 0.47 lb/hr and 2.1 tons/year from emissions units P001 - P007 (Pultrusion machines No. 1 - 7) and P011 (Dog bone saw) combined. Emissions units P001 - P007 and P011 share a common baghouse.

b. The particulate emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-22338]

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-22338]

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:

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-22338]

b. 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-22338]

c. 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 particulate emission 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).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-22338]

g) Miscellaneous Requirements

(1) None.

3. 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) (PTI P0116134)	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. The particulate emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

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.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-21-25(I), 40 CFR Part 63.5830 and PTI P0116134]

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

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW and PTI P0116134]

(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

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25 and PTI P0116134]

(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:

$$\text{VOC (lb/month)} = (1 - 0.60) \text{ x } (\frac{1}{2000}) \text{ x } \sum_{i}^{n} [(W)(P)] \text{ i x EF}$$

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116134]

(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.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.5895(e), OAC rule 3745-21-25(O)(2)(d) and PTI P0116134]

(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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116134]

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116134]

(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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116134]

(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.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25(D) and 40 CFR Part 63, Subpart WWWW and PTI P0116134]

(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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116134]

f) Testing Requirements

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

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

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

<u>Applicable Compliance Method</u>:

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116134]

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116134]

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116134]

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116134]

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116134]

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 particulate emission 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).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116134]

g) Miscellaneous Requirements

(1) None.