State of Ohio Environmental Protection Agency

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

RE: DRAFT PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
BUTLER COUNTY
Application No: 14-05356
Fac ID: 1409040850
DATE: 5/26/2005

Plas-Tanks Industries
Samuel Patrick
39 Standen Drive
Hamilton, OH 45015

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **$ 100** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA HCDES OH-KY-IN Regional Council of Gov. KY IN

BUTLER COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **14-05356** FOR AN AIR CONTAMINANT SOURCE FOR
Plas-Tanks Industries

On 5/26/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Plas-Tanks Industries**, located at **39 Standen Drive, Hamilton, Ohio**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05356:

Administrative Modification to PTI 14-05356 issued 2/25/2003 for Emissions Unit P006 (Station 6) Air Toxics Requirements.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Brad Miller, Hamilton County Department of Environmental Services, 250 William Howart Taft Pkwy, Cincinnati, OH 45219-2660 [(513)946-7777]

DRAFT MODIFICATION OF PERMIT TO INSTALL 14-05356

Application Number:	14-05356
Facility ID:	1409040850
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Plas-Tanks Industries
Person to Contact:	Samuel Patrick
Address:	39 Standen Drive Hamilton, OH 45015

Location of proposed air contaminant source(s) [emissions unit(s)]:
39 Standen Drive
Hamilton, Ohio, **Ohio**

Description of proposed emissions unit(s):
Administrative Modification to PTI 14-05356 issued 2/25/2003 for Emissions Unit P006 (Station 6) Air Toxics Requirements.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

_____
Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January

31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06**.**
Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

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

4. 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.

5. 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.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. 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 permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, 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.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. 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.

9. Compliance Requirements

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

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. 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.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. 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 appropriate Ohio EPA District Office or local air agency 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:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. 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.

10. Permit To Operate Application

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

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. 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, i.e., 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.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

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

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally

Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
OC	89.43
PM-PM10	117.96

Plas-Tanks Industries **Facility ID: 1409040850**
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Issued: To be entered upon final issuance

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

I. MACT "Hammer" Requirements

1. The permittee may be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastics Composites Production, 40 CFR Part 63, Subpart WWWW. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts. The deadline to submit the Part I application, as specified in 40 CFR Part 63.53, was May 15, 2002.

2 If the final NESHAP standard is not promulgated by the deadline specified by U.S. EPA, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted within 60 days after the deadline to promulgate the respective standard or by May 15, 2003, whichever is later. It must contain the following information, unless otherwise specified by future U.S. EPA regulations:

   a. for a new affected source, the anticipated date of startup of operation;
   b. the hazardous air pollutants (HAPs) emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for HAPs from the affected source;
   c. any existing federal, State, or local limitations or requirements applicable to the affected source;
   d. for each affected emission point or group of affected emission points, an identification of control technology in place;
   e. information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor; and
   f. any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to Subpart A of 40 CFR Part 63.

3. The Part II application for a MACT determination may, but is not required to, contain the following information:

   a. recommended emission limitations for the affected source and support information (the permittee may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation);
   b. a description of the control technologies that would be applied to meet the emission limitation, including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control

technologies must be applied; and

c. relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.

4. If the NESHAP is promulgated before the Part II application is due for the relevant source category, the permittee may be subject to the rule as an existing major source with a compliance date as specified in the NESHAP. If subject, the permittee shall submit the following notifications:

a. Unless otherwise specified in the relevant Subpart, within 120 days after promulgation of a 40 CFR Part 63 Subpart to which the source is subject, the permittee shall submit an Initial Notification Report that contains the following information, in accordance with 40 CFR Part 63.9(b)(2):

i. the name and mailing address of the permittee;

ii. the physical location of the source if it is different from the mailing address;

iii. identification of the relevant MACT standard and the source's compliance date;

iv. a brief description of the nature, design, size, and method of operation of the source, and an identification of the types of emission points within the affected source subject to the relevant standard and the types of HAPs emitted; and

v. a statement confirming the facility is a major source for HAPs.

b. Unless otherwise specified in the relevant Subpart, within 60 days following completion of any required compliance demonstration activity specified in the relevant Subpart, the permittee shall submit a notification of compliance status that contains the following information:

i. the methods used to determine compliance;

ii. the results of any performance tests, visible emission observations, continuous monitoring systems performance evaluations, and/or other monitoring procedures or methods that were conducted;

iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

iv. the type and quantity of HAPs emitted by the source, reported in units and averaging times in accordance with the test methods specified in the relevant Subpart;

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PTI A Emissions Unit ID: P001
Issued: To be entered upon final issuance

v. an analysis demonstrating whether the affected source is a major source or an area source;

vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each HAP and the control efficiency (percent) for each control device or method; and

vii. a statement of whether or not the permittee has complied with the requirements of the relevant Subpart.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements
P001 - Station 1 - Fiberglass tank fabrication using spray, filament winding, and hand layup	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-07(B)(1)
	OAC rule 3745-17-08(B)
	OAC rule 3745-17-11(B)

Applicable Emissions Limitations/Control Measures	
See term A.I.2.b. 250 lbs/day of OC from cleanup materials* 7.3 TPY of OC from coatings *facility-wide limit for P001-P006	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule. Visible particulate emissions from any fugitive dust emissions point shall not exceed 20% opacity, as a three-minute average, except as specified by rule.
See terms A.II.1 - A.II.8.	Compliance with the visible particulate emissions limitation as outlined in OAC rule 3745-17-07(B)(1) satisfies the reasonably available control measure requirements.
2.94 lbs/hour of PM/PM10 from fugitive emissions points 1.55 lbs/hour of PM/PM10 from the stack 19.66 TPY of PM/PM10 fugitive and stack emissions, combined. 6.78 TPY of PM/PM10 from stack emissions 12.88 TPY of PM/PM10 from fugitive emissions	Particulate emissions from any stack shall not exceed 1.55 lbs. of PM/PM10/hour as required by Table I.
The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-07(B)(1), 3745-17-08(B) and 3745-17-11(B).	
8 lbs/hr of OC from coatings (resins and gelcoats, excluding cleanup material) 40 lbs/day of OC from coatings (resins and gelcoats, excluding cleanup material)	

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by material usage limits, the use of accurate material measurements to determine gelcoat, resin and cleanup material usage, OC emission limitations, recordkeeping, reporting, and compliance with the OEPA Air Toxics Policy.

2.b The annual OC emission limit, from cleanup material, employed in emissions units P001 through P006, combined, shall not exceed 45.63 TPY, based on a rolling, 12-month summation.

2.c The hourly PM/PM10 emission limitations outlined are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

II. Operational Restrictions

1. The permittee shall employ coatings (resin/gelcoat) with a combination of styrene content and quantity that are sufficient to comply with the allowable emissions limitations specified in term A.I.1. of this permit and as required by OAC rule 3745-21-07(G)(2). Allowable usages for maximum styrene content coatings are specified below:

   a. For resins with a 58% styrene content, by weight, an emission factor of 468.2 lbs. of OC per ton of coating processed, and mechanical atomized application, the resin usage limit is 170.85 pounds of resin per day.

   b. For gelcoats with a 35% styrene content, by weight, and an emission factor of 336 lbs. of OC per ton of coating processed and atomized application, the resin usage limit is 238.1 pounds of resin per day.

   Note: Pigmented polyester resins are synonymous with gelcoats for purposes of determining an emissions factor. The usages above may be exceeded if lower styrene content coatings are employed, as long as the OC emission limits in term A.I.1 are not exceeded.

2. The combined amount of cleanup material evaporated in emissions unit P001 - P006 shall not exceed 250 pounds per day (or 37.88 gallons/day based on acetone).

3. The permittee shall employ only non-photochemically reactive cleanup materials in this emissions unit.

4. The permittee shall employ cleanup materials in emissions units P001-P006 which have a

maximum OC content not exceeding 6.6 pounds per gallon.

5. The permittee shall keep containers that store HAP (Hazardous Air Pollutant) materials and cleanup materials closed or covered except during the addition or removal of materials.

6. The permittee shall employ non-HAP containing cleanup materials in emissions unit P001 - P006.

7. The maximum styrene content for each resin employed in this emissions unit shall not exceed 58%, by weight.

8. The maximum styrene content for each gelcoat employed in this emissions unit shall not exceed 35%, by weight.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following coating (resin and gelcoat) information for each day for emissions unit P001:

   a. The company identification for each coating (resin and gelcoat) employed.

   b. The number of pounds of each coating (resin and gelcoat) employed.

   c. The percent styrene of each coating (resin and gelcoat) employed in this emissions unit.

   d. The Unified Emissions Factor (UEF) for each coating (resin and gelcoat) employed in this emissions unit, in pounds of OC/ton of coating employed.

   e. The total organic compound emission rate for all coatings (resins and gelcoats), in pounds per day (b/2000 x d).

f. The total number of hours the emissions unit was in operation.

g. The average hourly organic compound emission rate for all coatings, in pounds per hour (e /f).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall collect and record the following cleanup material information for each day for emissions units P001- P006:

a. The company identification for each cleanup material employed.

b. The total combined number of gallons of cleanup material evaporated each day in P001 - P006. Evaporated cleanup material is equal to [the amount of virgin material dispensed plus recycled cleanup material from the previous day] minus [the cleanup material left at the end of the day]. The amount of cleanup material used shall be determined by weighing it.

c. The organic compound content of the cleanup material, in pounds per gallon.

d. The daily combined (OC) emissions from cleanup materials evaporated from P001-P006, in pounds per day (b x c).

e. A record of each liquid organic cleanup material employed in this emissions unit indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5) or contains HAPs as identified in Section 112(b) of the Clean Air Act.

f. The permittee may record the use of cleanup material in pounds per day if the virgin and recycled cleanup material is weighed.

g. The permittee shall retain records of cleanup material analyses for the solvent and solids content of cleanup materials sent out for disposal.

3. The permittee shall maintain monthly records of the updated rolling, 12-month summation for all cleanup materials. This shall include the information for the current month and the preceding eleven months. These monthly records shall include the following information for emissions units: P001 through P006.

a. The company identification for each cleanup material employed in each emissions unit.

b. The sum of the number of gallons (or pounds) of each cleanup material employed in emissions units P001 - P006.

c. The organic compound content each cleanup material, in pounds of OC per gallon.

d. The total organic compound emission rate for all cleanup material, in pounds per month.

e. The amount of cleanup material sent out for disposal and the solvent content of that cleanup material.

f. The rolling,12-month summation of the total cleanup material usage for emissions units P001 through P006.

g. The rolling,12-month summation of the OC emissions from cleanup material for emissions units P001 through P006.

The solvent portion of any cleanup material sent out for disposal can be subtracted from the monthly cleanup material usage totals for emissions units P001-P006.

The permittee has existing cleanup usage records; therefore, cumulative cleanup material usage limits are not needed for the first year of operation after issuance of this permit.

4. The permittee shall install and operate metering equipment to measure the amount of all resins and gel coats used in this emissions unit. The permittee shall calibrate the meters to measure the amount, in weight or volume, of all resins and gel coats used in this emissions unit in accordance with the procedures specified by the manufacturer of the metering equipment as being necessary or appropriate to achieve the accuracy of the measurements guaranteed or specified by such manufacturer which accuracy shall be guaranteed or specified as being within plus or minus five percent (5%). If the manufacturer does not warrant or specify the calibration data or the accuracy of the material measurements for the metering equipment, the permittee shall perform calibration and accuracy tests on the equipment on a monthly basis during the first six months of operation of the meters. Thereafter the calibration and accuracy tests shall be conducted semi-annually based upon approval from Hamilton County Department of Environmental Services (HCDES). If approval from HCDES can not be granted by HCDES, then the permittee shall revert to performing calibration and accuracy tests on the equipment on a monthly basis until such time as the permittee can secure approval from HCDES to perform calibration and accuracy tests on the equipment on semi-annual basis.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the hourly and daily emissions limitations in T&C A.I.1.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the

usage limitations in T&C A.II.1. and 2.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the OC content limitation of 6.6 pounds of OC per gallon of cleanup material in T&C A.II.4.

4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the styrene content limitations in T&C A.II.7. and 8.

5. The permittee shall submit quarterly reports which specify the total organic compound emissions from cleanup materials for emissions units P001 through P006, and the updated rolling, 12-month summation of OC emissions for each calendar month . These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.

6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] and/or any HAP-containing cleanup material was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

7. The permittee shall submit annual reports which specify the total particulate matter and organic compound emissions from cleanup materials and coatings employed for this emissions unit. These reports shall be submitted by April 15 of each year and cover the previous calendar year.

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

9. No later than 30 days following the permittee's completion of the installation of the metering equipment, the permittee shall submit to the Hamilton County Department of Environmental Services written confirmation of the installation and operation of the metering equipment and documentation of the total costs spent by the permittee for the metering equipment.

10. Immediately upon completion of installation and initial operation of the metering equipment, the permittee shall provide the Hamilton County Department of Environmental Services the following information: the name of the manufacturer of the metering equipment, the make and model of the metering equipment, calibration data (e.g., volume of coating per pump stroke), a copy of the manufacturer's specifications and warranty for the accuracy of the metering equipment and the actual accuracy of the material measurements (by weight or by volume) recorded for the metering equipment.

11. The permittee shall submit the calibration and accuracy tests results for the first six month period within 180 days of the entry date of the Consent Order. Thereafter calibration and accuracy tests results shall be submitted by January 30 and July 30 of each calendar year if calibration and accuracy tests results are approved by HCDES .

V. Testing Requirements

1. Compliance with the OC emission limitations for coatings (resins and gelcoats) for this emissions unit shall be demonstrated by the record keeping required in T&C A. III. 1. and by using the most recent emission factors from the Unified Emissions Factors for Open Molding of Composites table. The appropriate emissions factors are based on the percent styrene in the coating, by weight, and the method of application. The following shall be used to determine the emissions:

   a. Lbs/day of OC emissions from coatings = lbs. of styrene emitted /ton coating employed X tons coating employed/day

   b. Lbs/hour of OC emissions from coatings = lbs. of styrene emitted /day divided by the hours of operation of the spray guns and/or hand layup brushes.

   c. Ton/year OC emissions from coatings = the sum of daily OC emissions for the calendar year.

2. Compliance with the combined (OC) emissions limitations for cleanup materials for emissions units P001 - P006 shall be demonstrated by the recordkeeping in T&C A.III.2. and 3. The following shall be used to determine the emissions:

   a. Tons/month of OC emissions from cleanup = the sum of daily OC emissions.

   b. Tons/year of OC emissions from cleanup = the sum of monthly OC emissions based on a rolling, 12-month summation.

3. Compliance with the usage restrictions in T&C A.II.2. of 250 pounds of cleanup material per day per six stations, combined, shall be demonstrated by the record keeping in term A.III. 2. and reporting in term A.IV.1.

4. Compliance with the annual group cleanup emissions limit in A.I.2.b. of 45.63 TPY shall be demonstrated by the recordkeeping in T&C A.III.3 and the reporting in T&C A.IV.1.

5. Compliance with OAC rule 3745-17-08(B) excluding 17-08(B)(9) shall be demonstrated by compliance with OAC rule 3745-17-07(B) utilizing the methods outlined in OAC rule 3745-17-03(B)(1) [Method 9].

6. Compliance with the visible particulate emissions limitation for fugitives and stacks shall be demonstrated by the methods outlined in 40 CFR, Part 60, Appendix A, Method 9.

7. Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of coatings and cleanup materials.

8. Compliance with OAC rule 3745- 17- 11 and the Table I limit of 1.55 lbs. of PM/PM10 per hour for stack emissions shall be demonstrated using the following equations:

   a. lbs of PM-PM10/Hour = amount of resin plus fiberglass (in pounds per hour) X 0.5 (decimal fraction of resin) X lbs of solids from resins and fiberglass per pound resin X (1-0.75 transfer efficiency) X 0.05 (amount of PM vented to the stack). The fiberglass is assumed to adhere to the product or be captured by the building enclosure.

   b. Tons of PM/Year = Summation of hourly PM emissions X annual hours of operation divided by 2000 pounds per ton.

   Should stack emissions testing be required, the permittee shall employ 40 CFR, Part 60, Appendix A, Methods 1 - 5.

9. Compliance with the styrene content limits in terms A.II.7 and A.II.8 shall be demonstrated by the record keeping in term A.III.1.

VI. Miscellaneous Requirements

1. When 40 CFR, Part 63, Subpart WWWW becomes finalized, the permittee shall comply with all applicable requirements of the rule.

2. If probable cause exists indicating, this emissions unit is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring this source into compliance.

3. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emissions units contained in permit to install 14-04022 as issued on June 2, 1997.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P001 - Station 1 - Fiberglass tank fabrication using spray, filament winding, and hand layup	OAC rule 3745-31-05(A)(3)	See term III.1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P001 was evaluated based on the actual materials(typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the Industrial Source Complex- Short Term (ISCST) version 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC). The MAGLC for resins and gelcoats was based on 7 days a week and five hours per day of operations. The MAGLC for cleanup was based on the maximum allowable and equal to TLV/10.

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85,235

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline for emissions units P001-P006 (ug/m3): 3,151.68

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 8,523.5

Pollutant: MMA

TLV (ug/m3): 204,703

Maximum Hourly Emission Rate (lbs/hr): 0.19

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline for emissions units P001-P006 (ug/m3): 378.2

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 20,470.3

Pollutant: Acetone

TLV (ug/m3): 1,187,117

Maximum Hourly Emission Rate (lbs/hr): 100

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline for emissions units P001-P006 (ug/m3):113,268.7

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 118,711.7

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists

(ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
P002 - Station 2 - Fiberglass tank fabrication using spray, filament winding, and hand layup	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-07(B)(1)
		OAC rule 3745-17-08 (B)
		OAC rule 3745-17-11(B)
	OAC rule 3745-21-07(G)(2)	

Applicable Emissions Limitations/Control Measures	
See term A.I.2.b. 250 lbs/day of OC from cleanup materials* 7.3 TPY of OC from coatings *facility-wide limit for P001-P006	from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule.
See terms A.II.1 - A.II.8.	Visible particulate emissions from any fugitive dust emissions point shall not exceed 20% opacity, as a three-minute average, except as specified by rule..
2.94 lbs/hour of PM/PM10 from fugitive emissions points 1.55 lbs/hour of PM/PM10 from the stack 19.66 TPY of PM/PM10 fugitive and stack emissions, combined. 6.78 TPY of PM/PM10 from stack emissions 12.88 TPY PM/PM10 from fugitive emissions	Compliance with the visible particulate emissions limitation as outlined in OAC rule 3745-17-07(B)(1) satisfies the reasonably available control measure requirements. Particulate emissions from any stack shall not exceed 1.55 lb. of PM/PM10/hour as required by Table I.
The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-07(B)(1), 3745-17-08(B) and 3745-17-11(B).	
8 lbs/hr OC from coatings (resins and gelcoats, excluding cleanup material) 40 lbs/day OC from coatings (resins and gelcoats, excluding cleanup material)	
Visible particulate emissions	

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by material usage limits, the use of accurate material measurements to determine gelcoat, resin and cleanup material usage, OC emission limitations, recordkeeping, reporting, and compliance with the OEPA Air Toxics Policy.

2.b The annual OC emission limit, from cleanup material, employed in emissions units P001 through P006, combined, shall not exceed 45.63 TPY, based on a rolling, 12-month summation.

2.c The hourly PM/PM10 emission limitations outlined are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

II. Operational Restrictions

1. The permittee shall employ coatings (resin/gelcoat) with a combination of styrene content and quantity that are sufficient to comply with the allowable emissions limitations specified in term A.I.1. of this permit and as required by OAC rule 3745-21-07(G)(2). Allowable usages for maximum styrene content coatings are specified below:

   a. For resins with a 58% styrene content, by weight, an emission factor of 468.2 lbs. of OC per ton of coating processed, and mechanical atomized application, the resin usage limit is 170.85 pounds of resin per day.

b. For gelcoats with a 35% styrene content, by weight, and an emission factor of 336 lbs. of OC per ton of coating processed and atomized application, the resin usage limit is 238.1 pounds of resin per day.

Note: Pigmented polyester resins are synonymous with gelcoats for purposes of determining an emissions factor. The usages above may be exceeded if lower styrene content coatings are employed, as long as the OC emission limits in term A.I.1 are not exceeded.

2. The combined amount of cleanup material evaporated in emissions unit P001 - P006 shall not exceed 250 pounds per day (or 37.88 gallons/day based on acetone).

3. The permittee shall employ only non-photochemically reactive cleanup materials in this emissions unit.

4. The permittee shall employ cleanup materials in emissions units P001-P006 which have a maximum OC content not exceeding 6.6 pounds per gallon.

5. The permittee shall keep containers that store HAP (Hazardous Air Pollutant) materials and cleanup materials closed or covered except during the addition or removal of materials.

6. The permittee shall employ non-HAP containing cleanup materials in emissions unit P001 - P006.

7. The maximum styrene content for each resin employed in this emissions unit shall not exceed 58%, by weight.

8. The maximum styrene content for each gelcoat employed in this emissions unit shall not exceed 35%, by weight.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following coating (resin and gelcoat) information for each day for emissions unit P001:

   a. The company identification for each coating (resin and gelcoat) employed.

   b. The number of pounds of each coating (resin and gelcoat) employed.

   c. The percent styrene of each coating (resin and gelcoat) employed in this emissions unit.

   d. The Unified Emissions Factor (UEF) for each coating (resin and gelcoat) employed in this emissions unit, in pounds of OC/ton of coating employed.

e. The total organic compound emission rate for all coatings (resins and gelcoats), in pounds per day (b/2000 x d).

f. The total number of hours the emissions unit was in operation.

g. The average hourly organic compound emission rate for all coatings, in pounds per hour (e /f).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall collect and record the following cleanup material information for each day for emissions units P001- P006:

a. The company identification for each cleanup material employed.

b. The total combined number of gallons of cleanup material evaporated each day in P001 - P006. Evaporated cleanup material is equal to [the amount of virgin material dispensed plus recycled cleanup material from the previous day] minus [the cleanup material left at the end of the day]. The amount of cleanup material used shall be determined by weighing it.

c. The organic compound content of the cleanup material, in pounds per gallon.

d. The daily combined (OC) emissions from cleanup materials evaporated from P001-P006, in pounds per day (b x c).

e. A record of each liquid organic cleanup material employed in this emissions unit indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5) or contains HAP's as identified in Section 112(b) of the Clean Air Act.

f. The permittee may record the use of cleanup material in pounds per day if the virgin and recycled cleanup material is weighed.

g. The permittee shall retain records of cleanup material analyses for the solvent and solids content of cleanup materials sent out for disposal.

3. The permittee shall maintain monthly records of the updated rolling, 12-month summation for all cleanup materials. This shall include the information for the current month and the preceding eleven months. These monthly records shall include the following information for emissions units: P001 through P006.

a. The company identification for each cleanup material employed in each emissions unit.

b. The sum of the number of gallons (or pounds) of each cleanup material employed in emissions units P001 - P006.

c. The organic compound content each cleanup material, in pounds of OC per gallon.

d. The total organic compound emission rate for all cleanup material, in pounds per month.

e. The amount of cleanup material sent out for disposal and the solvent content of that cleanup material.

f. The rolling,12-month summation of the total cleanup material usage for emissions units P001 through P006.

g. The rolling,12-month summation of the OC emissions from cleanup material for emissions units P001 through P006.

The solvent portion of any cleanup material sent out for disposal can be subtracted from the monthly cleanup material usage totals for emissions units P001-P006.

The permittee has existing cleanup usage records; therefore, cumulative cleanup material usage limits are not needed for the first year of operation after issuance of this permit.

4. The permittee shall install and operate metering equipment to measure the amount of all resins and gel coats used in this emissions unit. The permittee shall calibrate the meters to measure the amount, in weight or volume, of all resins and gel coats used in this emissions unit in accordance with the procedures specified by the manufacturer of the metering equipment as being necessary or appropriate to achieve the accuracy of the measurements guaranteed or specified by such manufacturer which accuracy shall be guaranteed or specified as being within plus or minus five percent (5%). If the manufacturer does not warrant or specify the calibration data or the accuracy of the material measurements for the metering equipment, the permittee shall perform calibration and accuracy tests on the equipment on a monthly basis during the first six months of operation of the meters. Thereafter the calibration and accuracy tests shall be conducted semi-annually based upon approval from Hamilton County Department of Environmental Services (HCDES). If approval from HCDES can not be granted by HCDES, then the permittee shall revert to performing calibration and accuracy tests on the equipment on a monthly basis until such time as the permittee can secure approval from HCDES to perform calibration and accuracy tests on the equipment on semi-annual basis.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the hourly and daily emissions limitations in T&C A.I.1.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1. and 2.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the OC content limitation of 6.6 pounds of OC per gallon of cleanup material in T&C A.II.4.

4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the styrene content limitations in T&C A.II.7. and 8.

5. The permittee shall submit quarterly reports which specify the total organic compound emissions from cleanup materials for emissions units P001 through P006, and the updated rolling, 12-month summation of OC emissions for each calendar month . These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.

6. The permittee shall notify the Hamilton County Department of Environmental Services in writing of each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] and/or any HAP-containing cleanup material was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

7. The permittee shall submit annual reports which specify the total particulate matter and organic compound emissions from cleanup materials and coatings employed for this emissions unit. These reports shall be submitted by April 15 of each year and cover the previous calendar year.

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

9. No later than 30 days following the permittee's completion of the installation of the metering equipment, the permittee shall submit to the Hamilton County Department of Environmental Services written confirmation of the installation and operation of the metering equipment and documentation of the total costs spent by the permittee for the metering equipment.

10. Immediately upon completion of installation and initial operation of the metering equipment, the permittee shall provide the Hamilton County Department of Environmental Services the following information: the name of the manufacturer of the metering equipment, the make and model of the metering equipment, calibration data (e.g., volume of coating per pump stroke), a copy of the manufacturer's specifications and warranty for the accuracy of the metering equipment and the actual accuracy of the material measurements (by weight or by volume) recorded for the metering equipment.

11. The permittee shall submit the calibration and accuracy tests results for the first six month period within 180 days of the entry date of the Consent Order. Thereafter calibration and accuracy tests results shall be submitted by January 30 and July 30 of each calendar year if calibration and accuracy tests results are approved by HCDES .

V. Testing Requirements

1. Compliance with the OC emission limitations for coatings (resins and gelcoats) for this emissions unit shall be demonstrated by the record keeping required in T&C A. III. 1. and by using the

most recent emission factors from the Unified Emissions Factors for Open Molding of Composites table. The appropriate emissions factors are based on the percent styrene in the coating, by weight, and the method of application. The following shall be used to determine the emissions:

a. Lbs/day OC emissions from coatings = lbs. styrene emitted /ton coating employed X tons coating employed/day

b. Lbs/hour OC emissions from coatings = lbs. styrene emitted /day divided by the hours of operation of the spray guns and/or hand layup brushes.

c. Ton/year OC emissions from coatings = the sum of daily OC emissions for the calendar year.

2. Compliance with the combined (OC) emissions limitations for cleanup materials for emissions units P001 - P006 shall be demonstrated by the recordkeeping in T&C A.III.2. and 3. The following shall be used to determine the emissions:

a. Tons/month of OC emissions from cleanup = the sum of daily OC emissions.

b. Tons/year of OC emissions from cleanup = the sum of monthly OC emissions based on a rolling, 12-month summation.

3. Compliance with the usage restrictions in T&C A.II.2. of 250 pounds of cleanup material per day per six stations, combined, shall be demonstrated by the recordkeeping in T&C A.III. 2. and reporting in A.IV.1.

4. Compliance with the annual group cleanup emissions limit in A.I.2.b. of 45.63 TPY shall be demonstrated by the recordkeeping in T&C A.III.3 and the reporting in T&C A.IV.1.

5. Compliance with OAC rule 3745-17-08(B) excluding 17-08(B)(9) shall be demonstrated by compliance with OAC rule 3745-17-07(B) utilizing the methods outlined in OAC rule 3745-17-03(B)(1) [Method 9].

6. Compliance with the visible particulate emissions limitation for fugitives and stacks shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

7. Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of coatings and cleanup materials.

8. Compliance with OAC rule 3745- 17- 11 and the Table I limit of 1.55 lbs. of PM/PM10 per hour for stack emissions shall be demonstrated using the following equations:

   a. lbs of PM-PM10/Hour = amount of resin plus fiberglass (in pounds per hour) X 0.5 (decimal fraction of resin) X lbs of solids from resins and fiberglass per pound resin X (1-0.75 transfer efficiency) X 0.05 (amount of PM vented to the stack). The fiberglass is assumed to adhere to the product or be captured by the building enclosure.

   b. Tons of PM/Year = Summation of hourly PM emissions X annual hours of operation divided by 2000 pounds per ton.

   Should stack emissions testing be required, the permittee shall employ 40 CFR, Part 60, Appendix A, Methods 1 - 5.

9. Compliance with the styrene content limits in terms A.II.7 and A.II.8 shall be demonstrated by the record keeping in term A.III.1

VI. Miscellaneous Requirements

1. When 40 CFR, Part 63, Subpart WWWW becomes finalized, the permittee shall comply with all applicable requirements of the rule.

2. If probable cause exist indicating the emissions unit is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring this source into compliance.

3. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emissions unit contained in permit to install 14-04022 as issued on June 2, 1997.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P002 - Station 2 - Fiberglass tank fabrication using spray, filament winding, and hand layup	OAC rule 3745-31-05(A)(3)	See term III.1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P002 was evaluated based on the actual materials(typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the Industrial Source Complex- Short Term (ISCST) version 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC). The MAGLC for resins and gelcoats was based on 7 days a week and five hours per day of operations. The MAGLC for cleanup was based on the maximum allowable and equal to TLV/10.

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85,235

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline for emissions units P001-P006 (ug/m3): 3,151.68

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 8,523.5

Pollutant: MMA

TLV (ug/m3): 204,703

Maximum Hourly Emission Rate (lbs/hr): 0.19

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline for emissions units P001-P006 (ug/m3): 378.2

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 20,470.3

Pollutant: Acetone

TLV (ug/m3): 1,187,117

Maximum Hourly Emission Rate (lbs/hr): 100

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline for emissions units P001-P006 (ug/m3):113,268.7

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 118,711.7

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists

(ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
P003 - Station 3 - Fiberglass tank fabrication using spray, filament winding, and hand layup	OAC rule 3745-31-05(A)(3)	
		OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-07(B)(1)
		OAC rule 3745-17-08(B)
		OAC rule 3745-17-11(B)
	OAC rule 3745-21-07(G)(2)	

Applicable Emissions Limitations/Control Measures	
See term A.I.2.b. 250 lbs/day of OC from cleanup materials* 7.3 TPY of OC from coatings *facility-wide limit for P001-P006	
See terms A.II.1 - A.II.8.	
2.94 lbs/hour of PM/PM10 from fugitive emissions points 1.55 lbs/hour of PM/PM10 from the stack 19.66 TPY of PM/PM10 fugitive and stack emissions, combined. 6.78 TPY of PM/PM10 from stack emissions 12.88 TPY of PM/PM10 from fugitive emissions	
The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-07(B)(1), 3745-17-08(B) and 3745-17-11(B).	
8 lbs/hr OC from coatings (resins and gelcoats, excluding cleanup material) 40 lbs/day OC from coatings (resins and gelcoats, excluding cleanup material)	
Visible particulate emissions from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule.	
Visible particulate emissions from any fugitive dust emissions point shall not exceed 20% opacity, as a three-minute average, except as specified by rule.	
Compliance with the visible particulate emissions limitation as outlined in OAC rule 3745-17-07(B)(1) satisfies the reasonably available control measure requirements.	
Particulate emissions from any stack shall not exceed 1.55 lb. of PM/PM10/hour as required by Table I.	

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by material usage limits, the use of accurate material measurements to determine gelcoat, resin and cleanup material usage, OC emission limitations, recordkeeping, reporting, and compliance with the OEPA Air Toxics Policy.

2.b The annual OC emission limit, from cleanup material, employed in emissions units P001 through P006, combined, shall not exceed 45.63 TPY, based on a rolling, 12-month summation.

2.c The hourly PM/PM10 emission limitations outlined are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

II. Operational Restrictions

1. The permittee shall employ coatings (resin/gelcoat) with a combination of styrene content and quantity that are sufficient to comply with the allowable emissions limitations specified in term A.I.1. of this permit and as required by OAC rule 3745-21-07(G)(2). Allowable usages for maximum styrene content coatings are specified below:

   a. For resins with a 58% styrene content, by weight, an emission factor of 468.2 lbs. of OC per ton of coating processed, and mechanical atomized application, the resin usage limit is 170.85 pounds of resin per day.

b. For gelcoats with a 35% styrene content, by weight, and an emission factor of 336 lbs. of OC per ton of coating processed and atomized application, the resin usage limit is 238.1 pounds of resin per day.

Note: Pigmented polyester resins are synonymous with gelcoats for purposes of determining an emissions factor. The usages above may be exceeded if lower styrene content coatings are employed, as long as the OC emission limits in term A.I.1 are not exceeded.

2. The combined amount of cleanup material evaporated in emissions unit P001 - P006 shall not exceed 250 pounds per day (or 37.88 gallons/day based on acetone).

3. The permittee shall employ only non-photochemically reactive cleanup materials in this emissions unit.

4. The permittee shall employ cleanup materials in emissions units P001-P006 which have a maximum OC content not exceeding 6.6 pounds per gallon.

5. The permittee shall keep containers that store HAP (Hazardous Air Pollutant) materials and cleanup materials closed or covered except during the addition or removal of materials.

6. The permittee shall employ non-HAP containing cleanup materials in emissions unit P001 - P006.

7. The maximum styrene content for each resin employed in this emissions unit shall not exceed 58%, by weight.

8. The maximum styrene content for each gelcoat employed in this emissions unit shall not exceed 35%, by weight.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following coating (resin and gelcoat) information for each day for emissions unit P001:

   a. The company identification for each coating (resin and gelcoat) employed.

   b. The number of pounds of each coating (resin and gelcoat) employed.

   c. The percent styrene of each coating (resin and gelcoat) employed in this emissions unit.

   d. The Unified Emissions Factor (UEF) for each coating (resin and gelcoat) employed in this emissions unit, in pounds OC/ton of coating employed.

e. The total organic compound emission rate for all coatings (resins and gelcoats), in pounds per day (b/2000 x d).

f. The total number of hours the emissions unit was in operation.

g. The average hourly organic compound emission rate for all coatings, in pounds per hour (e /f).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall collect and record the following cleanup material information for each day for emissions units P001- P006:

a. The company identification for each cleanup material employed.

b. The total combined number of gallons of cleanup material evaporated each day in P001 - P006. Evaporated cleanup material is equal to [the amount of virgin material dispensed plus recycled cleanup material from the previous day] minus [the cleanup material left at the end of the day]. The amount of cleanup material used shall be determined by weighing it.

c. The organic compound content of the cleanup material, in pounds per gallon.

d. The daily combined (OC) emissions from cleanup materials evaporated from P001-P006, in pounds per day (b x c).

e. A record of each liquid organic cleanup material employed in this emissions unit indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5) or contains HAP's as identified in Section 112(b) of the Clean Air Act.

f. The permittee may record the use of cleanup material in pounds per day if the virgin and recycled cleanup material is weighed.

g. The permittee shall retain records of cleanup material analyses for the solvent and solids content of cleanup materials sent out for disposal.

3. The permittee shall maintain monthly records of the updated rolling, 12-month summation for all cleanup materials. This shall include the information for the current month and the preceding eleven months. These monthly records shall include the following information for emissions units: P001 through P006.

a. The company identification for each cleanup material employed in each emissions unit.

b. The sum of the number of gallons (or pounds) of each cleanup material employed in emissions units P001 - P006.

c. The organic compound content each cleanup material, in pounds of OC per gallon.

d. The total organic compound emission rate for all cleanup material, in pounds per month.

e. The amount of cleanup material sent out for disposal and the solvent content of that cleanup material.

f. The rolling,12-month summation of the total cleanup material usage for emissions units P001 through P006.

g. The rolling,12-month summation of the OC emissions from cleanup material for emissions units P001 through P006.

The solvent portion of any cleanup material sent out for disposal can be subtracted from the monthly cleanup material usage totals for emissions units P001-P006.

The permittee has existing cleanup usage records; therefore, cumulative cleanup material usage limits are not needed for the first year of operation after issuance of this permit.

4. The permittee shall install and operate metering equipment to measure the amount of all resins and gel coats used in this emissions unit. The permittee shall calibrate the meters to measure the amount, in weight or volume, of all resins and gel coats used in this emissions unit in accordance with the procedures specified by the manufacturer of the metering equipment as being necessary or appropriate to achieve the accuracy of the measurements guaranteed or specified by such manufacturer which accuracy shall be guaranteed or specified as being within plus or minus five percent (5%). If the manufacturer does not warrant or specify the calibration data or the accuracy of the material measurements for the metering equipment, the permittee shall perform calibration and accuracy tests on the equipment on a monthly basis during the first six months of operation of the meters. Thereafter the calibration and accuracy tests shall be conducted semi-annually based upon approval from Hamilton County Department of Environmental Services (HCDES). If approval from HCDES can not be granted by HCDES, then the permittee shall revert to performing calibration and accuracy tests on the equipment on a monthly basis until such time as the permittee can secure approval from HCDES to perform calibration and accuracy tests on the equipment on semi-annual basis.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the hourly and daily emissions limitations in T&C A.I.1.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1. and 2.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the OC content limitation of 6.6 pounds of OC per gallon of cleanup material in T&C A.II.4.

4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the styrene content limitations in T&C A.II.7. and 8.

5. The permittee shall submit quarterly reports which specify the total organic compound emissions from cleanup materials for emissions units P001 through P006, and the updated rolling, 12-month summation of OC emissions for each calendar month . These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.

6. The permittee shall notify the Hamilton County Department of Environmental Services in writing of each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] and/or any HAP-containing cleanup material was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

7. The permittee shall submit annual reports which specify the total particulate matter and organic compound emissions from cleanup materials and coatings employed for this emissions unit. These reports shall be submitted by April 15 of each year and cover the previous calendar year.

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

9. No later than 30 days following the permittee's completion of the installation of the metering equipment, the permittee shall submit to the Hamilton County Department of Environmental Services written confirmation of the installation and operation of the metering equipment and documentation of the total costs spent by the permittee for the metering equipment.

10. Immediately upon completion of installation and initial operation of the metering equipment, the permittee shall provide the Hamilton County Department of Environmental Services the following information: the name of the manufacturer of the metering equipment, the make and model of the metering equipment, calibration data (e.g., volume of coating per pump stroke), a copy of the manufacturer's specifications and warranty for the accuracy of the metering equipment and the actual accuracy of the material measurements (by weight or by volume) recorded for the metering equipment.

11. The permittee shall submit the calibration and accuracy tests results for the first six month period within 180 days of the entry date of the Consent Order. Thereafter calibration and accuracy tests results shall be submitted by January 30 and July 30 of each calendar year if calibration and accuracy tests results are approved by HCDES .

V. Testing Requirements

1. Compliance with the OC emission limitations for coatings (resins and gelcoats) for this emissions unit shall be demonstrated by the record keeping required in T&C A. III. 1. and by using the most recent emissions factors from the Unified Emissions Factors for Open Molding of Composites table. The appropriate emissions factors are based on the percent styrene in the coating, by weight, and the method of application. The following shall be used to determine the emissions:

   a. Lbs/day of OC emissions from coatings = lbs. of styrene emitted /ton coating employed X tons coating employed/day

   b. Lbs/hour of OC emissions from coatings = lbs. of styrene emitted /day divided by the hours of operation of the spray guns and/or hand layup brushes.

   c. Ton/year of OC emissions from coatings = the sum of daily OC emissions for the calendar year.

2. Compliance with the combined (OC) emissions limitations for cleanup materials for emissions units P001 - P006 shall be demonstrated by the recordkeeping in T&C A.III.2. and 3. The following shall be used to determine the emissions:

   a. Tons/month of OC emissions from cleanup = the sum of daily OC emissions.

   b. Tons/year of OC emissions from cleanup = the sum of monthly OC emissions based on a rolling, 12-month summation.

3. Compliance with the usage restrictions in T&C A.II.2. of 250 pounds of cleanup material per day per six stations, combined, shall be demonstrated by the recordkeeping in T&C A.III. 2. and reporting in A.IV.1.

4. Compliance with the annual group cleanup emissions limit in A.I.2.b. of 45.63 TPY shall be demonstrated by the recordkeeping in T&C A.III.3 and the reporting in T&C A.IV.1.

5. Compliance with OAC rule 3745-17-08(B) excluding 17-08(B)(9) shall be demonstrated by compliance with OAC rule 3745-17-07(B) utilizing the methods outlined in OAC rules 3745-17-03(B)(1) [Method 9].

6. Compliance with the visible particulate emissions limitation for fugitives and stacks shall be demonstrated by the methods outlined in 40 CFR, Part 60, Appendix A, Method 9.

7. Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure

printing inks and related coatings) shall be used to determine the OC contents of coatings and cleanup materials.

8. Compliance with OAC rule 3745- 17- 11 and the Table I limit of 1.55 lbs. of PM/PM10 per hour for stack emissions shall be demonstrated using the following equations:

   a. lbs of PM-PM10/Hour = amount of resin plus fiberglass (in pounds per hour) X 0.5 (decimal fraction of resin) X lbs of solids from resins and fiberglass per pound resin X (1-0.75 transfer efficiency) X 0.05 (amount of PM vented to the stack). The fiberglass is assumed to adhere to the product or be captured by the building enclosure.

   b. Tons of PM/Year = Summation of hourly PM emissions X annual hours of operation divided by 2000 pounds per ton.

   Should stack emissions testing be required, the permittee shall employ 40 CFR, Part 60, Appendix A, Methods 1 - 5.

9. Compliance with the styrene content limits in terms A.II.7 and A.II.8 shall be demonstrated by the record keeping in term A.III.1.

VI. Miscellaneous Requirements

1. When 40 CFR, Part 63, Subpart WWWW becomes finalized, the permittee shall comply with all applicable requirements of the rule.

2. If probable cause exists indicating this emissions units is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring this source into compliance.

3. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emissions unit contained in permit to install 14-04022 as issued on June 2, 1997.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P003 - Station 3 - Fiberglass tank fabrication using spray, filament winding, and hand layup	OAC rule 3745-31-05(A)(3)	See term III.1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P003 was evaluated based on the actual materials(typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the Industrial Source Complex- Short Term (ISCST) version 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC). The MAGLC for resins and gelcoats was based on 7 days a week and five hours per day of operations. The MAGLC for cleanup was based on the maximum allowable and equal to TLV/10.

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85,235

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline for emissions units P001-P006 (ug/m3): 3,151.68

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 8,523.5

Pollutant: MMA

TLV (ug/m3): 204,703

Maximum Hourly Emission Rate (lbs/hr): 0.19

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline for emissions units P001-P006 (ug/m3): 378.2

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 20,470.3

Pollutant: Acetone

TLV (ug/m3): 1,187,117

Maximum Hourly Emission Rate (lbs/hr): 100

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline for emissions units P001-P006 (ug/m3):113,268.7

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 118,711.7

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists

(ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Plas-T
PTI A Emissions Unit ID: P003
Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
P004 - Station 4 - Fiberglass tank fabrication using spray, filament winding, and hand layup	OAC rule 3745-31-05(A)(3)	
		OAC rule 3745-17-07(A)
		OAC rule 3745-17-07(B)(1)
		OAC rule 3745-17-08 (B)
		OAC rule 3745-17-11(B)
	OAC rule 3745-21-07(G)(2)	

Applicable Emissions Limitations/Control Measures	
See term A.I.2.b. 250 lbs/day of OC from cleanup materials* 7.3 TPY of OC from coatings *facility-wide limit for P001-P006	from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule. Visible particulate emissions from any fugitive dust emissions point shall not exceed 20% opacity, as a three-minute average, except as specified by rule. Compliance with the visible particulate emissions limitation as outlined in OAC rule 3745-17-07(B)(1) satisfies the reasonably available control measure requirements.
See terms A.II.1 - A.II.8. 2.94 lbs/hour of PM/PM10 from fugitive emissions points 1.55 lbs/hour of PM/PM10 from the stack 19.66 TPY of PM/PM10 fugitive and stack emissions, combined. 6.78 TPY of PM/PM10 from stack emissions 12.88 TPY of PM/PM10 from fugitive emissions The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-07(B)(1), 3745-17-08(B) and 3745-17-11(B).	Particulate emissions from any stack shall not exceed 1.55 lb. PM/PM10/hour as required by Table I.
8 lbs/hr OC from coatings (resins and gelcoats, excluding cleanup material) 40 lbs/day OC from coatings (resins and gelcoats, excluding cleanup material)	
Visible particulate emissions	

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by material usage limits, the use of accurate material measurements to determine gelcoat, resin and cleanup material usage, OC emission limitations, recordkeeping, reporting, and compliance with the OEPA Air Toxics Policy.

2.b The annual OC emission limit, from cleanup material, employed in emissions units P001 through P006, combined, shall not exceed 45.63 TPY, based on a rolling, 12-month summation.

2.c The hourly PM/PM10 emission limitations outlined are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

II. Operational Restrictions

1. The permittee shall employ coatings (resin/gelcoat) with a combination of styrene content and quantity that are sufficient to comply with the allowable emissions limitations specified in term A.I.1. of this permit and as required by OAC rule 3745-21-07(G)(2). Allowable usages for maximum styrene content coatings are specified below:

   a. For resins with a 58% styrene content, by weight, an emission factor of 468.2 lbs. of OC per ton of coating processed, and mechanical atomized application, the resin usage limit is 170.85 pounds of resin per day.

b. For gelcoats with a 35% styrene content, by weight, and an emission factor of 336 lbs. of OC per ton of coating processed and atomized application, the resin usage limit is 238.1 pounds of resin per day.

Note: Pigmented polyester resins are synonymous with gelcoats for purposes of determining an emissions factor. The usages above may be exceeded if lower styrene content coatings are employed, as long as the OC emission limits in term A.I.1 are not exceeded.

2. The combined amount of cleanup material evaporated in emissions unit P001 - P006 shall not exceed 250 pounds per day (or 37.88 gallons/day based on acetone).

3. The permittee shall employ only non-photochemically reactive cleanup materials in this emissions unit.

4. The permittee shall employ cleanup materials in emissions units P001-P006 which have a maximum OC content not exceeding 6.6 pounds per gallon.

5. The permittee shall keep containers that store HAP (Hazardous Air Pollutant) materials and cleanup materials closed or covered except during the addition or removal of materials.

6. The permittee shall employ non-HAP containing cleanup materials in emissions unit P001 - P006.

7. The maximum styrene content for each resin employed in this emissions unit shall not exceed 58%, by weight.

8. The maximum styrene content for each gelcoat employed in this emissions unit shall not exceed 35%, by weight.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following coating (resin and gelcoat) information for each day for emissions unit P001:

   a. The company identification for each coating (resin and gelcoat) employed.

   b. The number of pounds of each coating (resin and gelcoat) employed.

   c. The percent styrene of each coating (resin and gelcoat) employed in this emissions unit.

   d. The Unified Emissions Factor (UEF) for each coating (resin and gelcoat) employed in this emissions unit, in pounds OC/ton of coating employed.

e. The total organic compound emission rate for all coatings (resins and gelcoats), in pounds per day (b/2000 x d).

f. The total number of hours the emissions unit was in operation.

g. The average hourly organic compound emission rate for all coatings, in pounds per hour (e /f).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall collect and record the following cleanup material information for each day for emissions units P001- P006:

a. The company identification for each cleanup material employed.

b. The total combined number of gallons of cleanup material evaporated each day in P001 - P006. Evaporated cleanup material is equal to [the amount of virgin material dispensed plus recycled cleanup material from the previous day] minus [the cleanup material left at the end of the day]. The amount of cleanup material used shall be determined by weighing it.

c. The organic compound content of the cleanup material, in pounds per gallon.

d. The daily combined (OC) emissions from cleanup materials evaporated from P001-P006, in pounds per day (b x c).

e. A record of each liquid organic cleanup material employed in this emissions unit indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5) or contains HAP's as identified in Section 112(b) of the Clean Air Act.

f. The permittee may record the use of cleanup material in pounds per day if the virgin and recycled cleanup material is weighed.

g. The permittee shall retain records of cleanup material analyses for the solvent and solids content of cleanup materials sent out for disposal.

3. The permittee shall maintain monthly records of the updated rolling, 12-month summation for all cleanup materials. This shall include the information for the current month and the preceding eleven months. These monthly records shall include the following information for emissions units: P001 through P006.

a. The company identification for each cleanup material employed in each emissions unit.

b. The sum of the number of gallons (or pounds) of each cleanup material employed in emissions units P001 - P006.

c. The organic compound content each cleanup material, in pounds of OC per gallon.

d. The total organic compound emission rate for all cleanup material, in pounds per month.

e. The amount of cleanup material sent out for disposal and the solvent content of that cleanup material.

f. The rolling,12-month summation of the total cleanup material usage for emissions units P001 through P006.

g. The rolling,12-month summation of the OC emissions from cleanup material for emissions units P001 through P006.

The solvent portion of any cleanup material sent out for disposal can be subtracted from the monthly cleanup material usage totals for emissions units P001-P006.

The permittee has existing cleanup usage records; therefore, cumulative cleanup material usage limits are not needed for the first year of operation after issuance of this permit.

4. The permittee shall install and operate metering equipment to measure the amount of all resins and gel coats used in this emissions unit. The permittee shall calibrate the meters to measure the amount, in weight or volume, of all resins and gel coats used in this emissions unit in accordance with the procedures specified by the manufacturer of the metering equipment as being necessary or appropriate to achieve the accuracy of the measurements guaranteed or specified by such manufacturer which accuracy shall be guaranteed or specified as being within plus or minus five percent (5%). If the manufacturer does not warrant or specify the calibration data or the accuracy of the material measurements for the metering equipment, the permittee shall perform calibration and accuracy tests on the equipment on a monthly basis during the first six months of operation of the meters. Thereafter the calibration and accuracy tests shall be conducted semi-annually based upon approval from Hamilton County Department of Environmental Services (HCDES). If approval from HCDES can not be granted by HCDES, then the permittee shall revert to performing calibration and accuracy tests on the equipment on a monthly basis until such time as the permittee can secure approval from HCDES to perform calibration and accuracy tests on the equipment on semi-annual basis.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the hourly and daily emissions limitations in T&C A.I.1.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1. and 2.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the OC content limitation of 6.6 pounds of OC per gallon of cleanup material in T&C A.II.4.

4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the styrene content limitations in T&C A.II.7. and 8.

5. The permittee shall submit quarterly reports which specify the total organic compound emissions from cleanup materials for emissions units P001 through P006, and the updated rolling, 12-month summation of OC emissions for each calendar month . These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.

6. The permittee shall notify the Hamilton County Department of Environmental Services in writing of each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] and/or any HAP-containing cleanup material was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

7. The permittee shall submit annual reports which specify the total particulate matter and organic compound emissions from cleanup materials and coatings employed for this emissions unit. These reports shall be submitted by April 15 of each year and cover the previous calendar year.

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

9. No later than 30 days following the permittee's completion of the installation of the metering equipment, the permittee shall submit to the Hamilton County Department of Environmental Services written confirmation of the installation and operation of the metering equipment and documentation of the total costs spent by the permittee for the metering equipment.

10. Immediately upon completion of installation and initial operation of the metering equipment, the permittee shall provide the Hamilton County Department of Environmental Services the following information: the name of the manufacturer of the metering equipment, the make and model of the metering equipment, calibration data (e.g., volume of coating per pump stroke), a copy of the manufacturer's specifications and warranty for the accuracy of the metering equipment and the actual accuracy of the material measurements (by weight or by volume) recorded for the metering equipment.

11. The permittee shall submit the calibration and accuracy tests results for the first six month period within 180 days of the entry date of the Consent Order. Thereafter calibration and accuracy tests results shall be submitted by January 30 and July 30 of each calendar year if calibration and accuracy tests results are approved by HCDES .

V. Testing Requirements

1. Compliance with the OC emission limitations for coatings (resins and gelcoats) for this emissions unit shall be demonstrated by the record keeping required in T&C A. III. 1. and by using the most recent emission factors from the Unified Emissions Factors for Open Molding of Composites table. The appropriate emissions factors are based on the percent styrene in the coating, by weight, and the method of application. The following shall be used to determine the emissions:

   a. Lbs/day of OC emissions from coatings = lbs. of styrene emitted /ton coating employed X tons coating employed/day

   b. Lbs/hour of OC emissions from coatings = lbs. of styrene emitted /day divided by the hours of operation of the spray guns and/or hand layup brushes.

   c. Ton/year of OC emissions from coatings = the sum of daily OC emissions for the calendar year.

2. Compliance with the combined (OC) emissions limitations for cleanup materials for emissions units P001 - P006 shall be demonstrated by the recordkeeping in T&C A.III.2. and 3. The following shall be used to determine the emissions:

   a. Tons/month of OC emissions from cleanup = the sum of daily OC emissions.

   b. Tons/year of OC emissions from cleanup = the sum of monthly OC emissions based on a rolling, 12-month summation.

3. Compliance with the usage restrictions in T&C A.II.2. of 250 pounds cleanup material per day per six stations, combined, shall be demonstrated by the record keeping in T&C A.III. 2. and reporting in A.IV.1.

4. Compliance with the annual group cleanup emissions limit in A.I.2.b. of 45.63 TPY shall be demonstrated by the recordkeeping in T&C A.III.3 and the reporting in T&C A.IV.1.

5. Compliance with OAC rule 3745-17-08(B) excluding 17-08(B)(9) shall be demonstrated by compliance with OAC rule 3745-17-07(B) utilizing the methods outlined in OAC rule 3745-17-03(B)(1) [Method 9].

6. Compliance with the visible particulate emissions limitation for fugitives and stacks shall be demonstrated by the methods outlined in 40 CFR, Part 60, Appendix A, Method 9.

7. Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure

printing inks and related coatings) shall be used to determine the OC contents of coatings and cleanup materials.

8. Compliance with OAC rule 3745- 17- 11 and the Table I limit of 1.55 lbs. of PM/PM10 per hour for stack emissions shall be demonstrated using the following equations:

   a. lbs of PM-PM10/Hour = amount of resin plus fiberglass (in pounds per hour) X 0.5 (decimal fraction of resin) X lbs of solids from resins and fiberglass per pound resin X (1-0.75 transfer efficiency) X 0.05 (amount of PM vented to the stack). The fiberglass is assumed to adhere to the product or be captured by the building enclosure.

   b. Tons of PM/Year = Summation of hourly PM emissions X annual hours of operation divided by 2000 pounds per ton.

   Should stack emissions testing be required, the permittee shall employ 40 CFR, Part 60, Appendix A, Methods 1 - 5.

9. Compliance with the styrene content limits in terms A.II.7 and A.II.8 shall be demonstrated by the record keeping in term A.III.1.

VI. Miscellaneous Requirements

1. When 40 CFR, Part 63, Subpart WWWW becomes finalized, the permittee shall comply with all applicable requirements of the rule.

2. If probable cause exists indicating this emissions unit is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring this source into compliance.

3. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emissions unit contained in permit to install 14-04022 as issued on June 2, 1997.

Plas-T
PTI A Emissions Unit ID: P004
Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P004 - Station 4 - Fiberglass tank fabrication using spray, filament winding, and hand layup	OAC rule 3745-31-05(A)(3)	See term III.1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P004 was evaluated based on the actual materials(typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the Industrial Source Complex- Short Term (ISCST) version 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC). The MAGLC for resins and gelcoats was based on 7 days a week and five hours per day of operations. The MAGLC for cleanup was based on the maximum allowable and equal to TLV/10.

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85,235

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline for emissions units P001-P006 (ug/m3): 3,151.68

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 8,523.5

Pollutant: MMA

TLV (ug/m3): 204,703

Maximum Hourly Emission Rate (lbs/hr): 0.19

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline for emissions units P001-P006 (ug/m3): 378.2

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 20,470.3

Pollutant: Acetone

TLV (ug/m3): 1,187,117

Maximum Hourly Emission Rate (lbs/hr): 100

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline for emissions units P001-P006 (ug/m3):113,268.7

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 118,711.7

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists

(ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
P005 - Station 5 - Fiberglass tank fabrication using spray, filament winding, and hand layup	OAC rule 3745-31-05(A)(3)	
		OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-07(B)(1)
		OAC rule 3745-17-08(B)
		OAC rule 3745-17-11(B)
	OAC rule 3745-21-07(G)(2)	

Applicable Emissions Limitations/Control Measures	
See term A.I.2.b. 250 lbs/day of OC from cleanup materials* 7.3 TPY of OC from coatings *facility-wide limit for P001-P006	from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule. Visible particulate emissions from any fugitive dust emissions point shall not exceed 20% opacity, as a three-minute average, except as specified by rule. Compliance with the visible particulate emissions limitation as outlined in OAC rule 3745-17-07(B)(1) satisfies the reasonably available control measure requirements.
See terms A.II.1 - A.II.8.	
2.94 lbs/hour of PM/PM10 from fugitive emissions points 1.55 lbs/hour of PM/PM10 from the stack 19.66 TPY of PM/PM10 fugitive and stack emissions, combined. 6.78 TPY of PM/PM10 from stack emissions 12.88 TPY of PM/PM10 from fugitive emissions	Particulate emissions from any stack shall not exceed 1.55 lb. of PM/PM10/hour as required by Table I.
The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-07(B)(1), 3745-17-08(B) and 3745-17-11(B).	
8 lbs/hr OC from coatings (resins and gelcoats, excluding cleanup material) 40 lbs/day OC from coatings (resins and gelcoats, excluding cleanup material)	
Visible particulate emissions	

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by material usage limits, the use of accurate material measurements to determine gelcoat, resin and cleanup material usage, OC emission limitations, recordkeeping, reporting, and compliance with the OEPA Air Toxics Policy.

2.b The annual OC emission limit, from cleanup material, employed in emissions units P001 through P006, combined, shall not exceed 45.63 TPY, based on a rolling, 12-month summation.

2.c The hourly PM/PM10 emission limitations outlined are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

II. Operational Restrictions

1. The permittee shall employ coatings (resin/gelcoat) with a combination of styrene content and quantity that are sufficient to comply with the allowable emissions limitations specified in term A.I.1. of this permit and as required by OAC rule 3745-21-07(G)(2). Allowable usages for maximum styrene content coatings are specified below:

   a. For resins with a 58% styrene content, by weight, an emission factor of 468.2 lbs. of OC per ton of coating processed, and mechanical atomized application, the resin usage limit is 170.85 pounds of resin per day.

b. For gelcoats with a 35% styrene content, by weight, and an emission factor of 336 lbs. of OC per ton of coating processed and atomized application, the resin usage limit is 238.1 pounds of resin per day.

Note: Pigmented polyester resins are synonymous with gelcoats for purposes of determining an emissions factor. The usages above may be exceeded if lower styrene content coatings are employed, as long as the OC emission limits in term A.I.1 are not exceeded.

2. The combined amount of cleanup material evaporated in emissions unit P001 - P006 shall not exceed 250 pounds per day (or 37.88 gallons/day based on acetone).

3. The permittee shall employ only non-photochemically reactive cleanup materials in this emissions unit.

4. The permittee shall employ cleanup materials in emissions units P001-P006 which have a maximum OC content not exceeding 6.6 pounds per gallon.

5. The permittee shall keep containers that store HAP (Hazardous Air Pollutant) materials and cleanup materials closed or covered except during the addition or removal of materials.

6. The permittee shall employ non-HAP containing cleanup materials in emissions unit P001 - P006.

7. The maximum styrene content for each resin employed in this emissions unit shall not exceed 58%, by weight.

8. The maximum styrene content for each gelcoat employed in this emissions unit shall not exceed 35%, by weight.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following coating (resin and gelcoat) information for each day for emissions unit P001:

   a. The company identification for each coating (resin and gelcoat) employed.

   b. The number of pounds of each coating (resin and gelcoat) employed.

   c. The percent styrene of each coating (resin and gelcoat) employed in this emissions unit.

   d. The Unified Emissions Factor (UEF) for each coating (resin and gelcoat) employed in this emissions unit, in pounds OC/ton of coating employed.

e. The total organic compound emission rate for all coatings (resins and gelcoats), in pounds per day (b/2000 x d).

f. The total number of hours the emissions unit was in operation.

g. The average hourly organic compound emission rate for all coatings, in pounds per hour (e /f).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall collect and record the following cleanup material information for each day for emissions units P001- P006:

a. The company identification for each cleanup material employed.

b. The total combined number of gallons of cleanup material evaporated each day in P001 - P006. Evaporated cleanup material is equal to [the amount of virgin material dispensed plus recycled cleanup material from the previous day] minus [the cleanup material left at the end of the day]. The amount of cleanup material used shall be determined by weighing it.

c. The organic compound content of the cleanup material, in pounds per gallon.

d. The daily combined (OC) emissions from cleanup materials evaporated from P001-P006, in pounds per day (b x c).

e. A record of each liquid organic cleanup material employed in this emissions unit indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5) or contains HAP's as identified in Section 112(b) of the Clean Air Act.

f. The permittee may record the use of cleanup material in pounds per day if the virgin and recycled cleanup material is weighed.

g. The permittee shall retain records of cleanup material analyses for the solvent and solids content of cleanup materials sent out for disposal.

3. The permittee shall maintain monthly records of the updated rolling, 12-month summation for all cleanup materials. This shall include the information for the current month and the preceding eleven months. These monthly records shall include the following information for emissions units: P001 through P006.

a. The company identification for each cleanup material employed in each emissions unit.

b. The sum of the number of gallons (or pounds) of each cleanup material employed in emissions units P001 - P006.

c. The organic compound content each cleanup material, in pounds of OC per gallon.

d. The total organic compound emission rate for all cleanup material, in pounds per month.

e. The amount of cleanup material sent out for disposal and the solvent content of that cleanup material.

f. The rolling,12-month summation of the total cleanup material usage for emissions units P001 through P006.

g. The rolling,12-month summation of the OC emissions from cleanup material for emissions units P001 through P006.

The solvent portion of any cleanup material sent out for disposal can be subtracted from the monthly cleanup material usage totals for emissions units P001-P006.

The permittee has existing cleanup usage records; therefore, cumulative cleanup material usage limits are not needed for the first year of operation after issuance of this permit.

4. The permittee shall install and operate metering equipment to measure the amount of all resins and gel coats used in this emissions unit. The permittee shall calibrate the meters to measure the amount, in weight or volume, of all resins and gel coats used in this emissions unit in accordance with the procedures specified by the manufacturer of the metering equipment as being necessary or appropriate to achieve the accuracy of the measurements guaranteed or specified by such manufacturer which accuracy shall be guaranteed or specified as being within plus or minus five percent (5%). If the manufacturer does not warrant or specify the calibration data or the accuracy of the material measurements for the metering equipment, the permittee shall perform calibration and accuracy tests on the equipment on a monthly basis during the first six months of operation of the meters. Thereafter the calibration and accuracy tests shall be conducted semi-annually based upon approval from Hamilton County Department of Environmental Services (HCDES). If approval from HCDES can not be granted by HCDES, then the permittee shall revert to performing calibration and accuracy tests on the equipment on a monthly basis until such time as the permittee can secure approval from HCDES to perform calibration and accuracy tests on the equipment on semi-annual basis.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the hourly and daily emissions limitations in T&C A.I.1.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1. and 2.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the OC content limitation of 6.6 pounds of OC per gallon of cleanup material in T&C A.II.4.

4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the styrene content limitations in T&C A.II.7. and 8.

5. The permittee shall submit quarterly reports which specify the total organic compound emissions from cleanup materials for emissions units P001 through P006, and the updated rolling, 12 month summation of OC emissions for each calendar month . These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.

6. The permittee shall notify the Hamilton County Department of Environmental Services in writing of each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] and/or any HAP containing cleanup material was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

7. The permittee shall submit annual reports which specify the total particulate matter and organic compound emissions from cleanup materials and coatings employed for this emissions unit. These reports shall be submitted by April 15 of each year and cover the previous calendar year.

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

9. No later than 30 days following the permittee's completion of the installation of the metering equipment, the permittee shall submit to the Hamilton County Department of Environmental Services written confirmation of the installation and operation of the metering equipment and documentation of the total costs spent by the permittee for the metering equipment.

10. Immediately upon completion of installation and initial operation of the metering equipment, the permittee shall provide the Hamilton County Department of Environmental Services the following information: the name of the manufacturer of the metering equipment, the make and model of the metering equipment, calibration data (e.g., volume of coating per pump stroke), a copy of the manufacturer's specifications and warranty for the accuracy of the metering equipment and the actual accuracy of the material measurements (by weight or by volume) recorded for the metering equipment.

11. The permittee shall submit the calibration and accuracy tests results for the first six month period within 180 days of the entry date of the Consent Order. Thereafter calibration and accuracy tests results shall be submitted by January 30 and July 30 of each calendar year if calibration and accuracy tests results are approved by HCDES .

V. Testing Requirements

1. Compliance with the OC emission limitations for coatings (resins and gelcoats) for this emissions unit shall be demonstrated by the record keeping required in T&C A. III. 1. and by using the most recent emissions factors from the Unified Emissions Factors for Open Molding of Composites table. The appropriate emission factors are based on the percent styrene in the coating, by weight, and the method of application. The following shall be used to determine the emissions:

   a. Lbs/day of OC emissions from coatings = lbs. of styrene emitted /ton coating employed X tons coating employed/day

   b. Lbs/hour of OC emissions from coatings = lbs. of styrene emitted /day divided by the hours of operation of the spray guns and/or hand layup brushes.

   c. Ton/year of OC emissions from coatings = the sum of daily OC emissions for the calendar year.

2. Compliance with the combined (OC) emissions limitations for cleanup materials for emissions units P001 - P006 shall be demonstrated by the recordkeeping in T&C A.III.2. and 3. The following shall be used to determine the emissions:

   a. Tons/month of OC emissions from cleanup = the sum of daily OC emissions.

   b. Tons/year of OC emissions from cleanup = the sum of monthly OC emissions based on a rolling, 12-month summation.

3. Compliance with the usage restrictions in T&C A.II.2. of 250 pounds of cleanup material per day per six stations, combined, shall be demonstrated by the recordkeeping in T&C A.III. 2. and reporting in A.IV.1.

4. Compliance with the annual group cleanup emissions limit in A.I.2.b. of 45.63 TPY shall be demonstrated by the record keeping in T&C A.III.3 and the reporting in term A.IV.1.

5. Compliance with OAC rule 3745-17-08(B) excluding 17-08(B)(9) shall be demonstrated by compliance with OAC rule 3745-17-07(B) utilizing the methods outlined in OAC rules 3745-17-03(B)(1) [Method 9].

6. Compliance with the visible particulate emissions limitation for fugitives and stacks shall be demonstrated by the methods outlined in 40 CFR, Part 60, Appendix A, Method 9.

7. Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure

printing inks and related coatings) shall be used to determine the OC contents of coatings and cleanup materials.

8. Compliance with OAC rule 3745- 17- 11 and the Table I limit of 1.55 lbs. of PM/PM10 per hour for stack emissions shall be demonstrated using the following equations:

   a. lbs of PM-PM10/Hour = amount of resin plus fiberglass (in pounds per hour) X 0.5 (decimal fraction of resin) X lbs of solids from resins and fiberglass per pound resin X (1-0.75 transfer efficiency) X 0.05 (amount of PM vented to the stack). The fiberglass is assumed to adhere to the product or be captured by the building enclosure.

   b. Tons of PM/Year = Summation of hourly PM emissions X annual hours of operation divided by 2000 pounds per ton.

   Should stack emissions testing be required, the permittee shall employ 40 CFR, Part 60, Appendix A, Methods 1 - 5.

9. Compliance with the styrene content limits in terms A.II.7 and A.II.8 shall be demonstrated by the record keeping in term A.III.1.

VI. Miscellaneous Requirements

1. When 40 CFR, Part 63, Subpart WWWW becomes finalized, the permittee shall comply with all applicable requirements of the rule.

2. If probable cause exists indicating this emissions unit is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring this source into compliance.

3. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emissions unit contained in permit to install 14-04022 as issued on June 2, 1997.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P005 - Station 5 - Fiberglass tank fabrication using spray, filament winding, and hand layup	OAC rule 3745-31-05(A)(3)	See term III.1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P005 was evaluated based on the actual materials(typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the Industrial Source Complex- Short Term (ISCST) version 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC). The MAGLC for resins and gelcoats was based on 7 days a week and five hours per day of operations. The MAGLC for cleanup was based on the maximum allowable and equal to TLV/10.

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85,235

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline for emissions units P001-P006 (ug/m3): 3,151.68

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 8,523.5

Pollutant: MMA

TLV (ug/m3): 204,703

Maximum Hourly Emission Rate (lbs/hr): 0.19

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline for emissions units P001-P006 (ug/m3): 378.2

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 20,470.3

Pollutant: Acetone

TLV (ug/m3): 1,187,117

Maximum Hourly Emission Rate (lbs/hr): 100

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline for emissions units P001-P006 (ug/m3):113,268.7

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 118,711.7

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists

(ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements
P006 - Station 6 - Fiberglass tank fabrication using spray, filament winding, and hand layup - MODIFICATION	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-07(B)(1)
	OAC rule 3745-17-08(B)
	OAC rule 3745-17-11(B)

Applicable Emissions Limitations/Control Measures	
The emissions from P006 shall not exceed the following:	(resins and gelcoats, excluding cleanup material) Visible particulate emissions from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule.
See term A.I.2.b. 250 lbs/day of OC from cleanup materials* 7.3 TPY of OC from coatings *facility-wide limit for P001-P006	Visible particulate emissions from any fugitive dust emissions point shall not exceed 20% opacity, as a three-minute average, except as specified by rule..
See terms A.II.1 - A.II.8.	Compliance with the visible particulate emissions limitation as outlined in OAC rule 3745-17-07(B)(1) satisfies the reasonably available control measure requirements.
2.94 lbs/hour of PM/PM10 from fugitive emissions points 1.55 lbs/hour of PM/PM10 from the stack 19.66 TPY of PM/PM10 fugitive and stack emissions, combined. 6.78 TPY of PM/PM10 from stack emissions 12.88 TPY of PM/PM10 from fugitive emissions	Particulate emissions from any stack shall not exceed 1.55 lb. of PM/PM10/hour as required by Table I.
The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-07(B)(1), 3745-17-08(B) and 3745-17-11(B).	
8 lbs/hr OC from coatings (resins and gelcoats, excluding cleanup material) 40 lbs/day OC from coatings	

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by material usage limits, , the use of accurate material measurements to determine gelcoat, resin and cleanup material usage and OC emission limitations, record keeping, and reporting requirements.

2.b The annual OC emission limit, from cleanup material, employed in emissions units P001 through P006, combined, shall not exceed 45.63 TPY, based on a rolling, 12-month summation.

2.c The hourly PM/PM10 emission limitations outlined are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

II. Operational Restrictions

1. The permittee shall employ coatings (resin/gelcoat) with a combination of styrene content and quantity that are sufficient to comply with the allowable emissions limitations specified in term A.I.1. of this permit and as required by OAC rule 3745-21-07(G)(2). Allowable usages for maximum styrene content coatings are specified below:

   a. For resins with a 58% styrene content, by weight, an emission factor of 468.2 lbs. of OC per ton of coating processed, and mechanical atomized application, the resin usage limit is 170.85 pounds of resin per day.

b. For gelcoats with a 35% styrene content, by weight, and an emission factor of 336 lbs. of OC per ton of coating processed and atomized application, the resin usage limit is 238.1 pounds of resin per day.

Note: Pigmented polyester resins are synonymous with gelcoats for purposes of determining an emissions factor. The usages above may be exceeded if lower styrene content coatings are employed, as long as the OC emission limits in term A.I.1 are not exceeded.

2. The combined amount of cleanup material evaporated in emissions unit P001 - P006 shall not exceed 250 pounds per day (or 37.88 gallons/day based on acetone).

3. The permittee shall employ only non-photochemically reactive cleanup materials in this emissions unit.

4. The permittee shall employ cleanup materials in emissions units P001-P006 which have a maximum OC content not exceeding 6.6 pounds per gallon.

5. The permittee shall keep containers that store HAP (Hazardous Air Pollutant) materials and cleanup materials closed or covered except during the addition or removal of materials.

6. The permittee shall employ non-HAP containing cleanup materials in emissions unit P001 - P006.

7. The maximum styrene content for each resin employed in this emissions unit shall not exceed 58%, by weight.

8. The maximum styrene content for each gelcoat employed in this emissions unit shall not exceed 35%, by weight.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following coating (resin and gelcoat) information for each day for emissions unit P001:

   a. The company identification for each coating (resin and gelcoat) employed.

   b. The number of pounds of each coating (resin and gelcoat) employed. This shall be determined by weighing the coating.

   c. The percent styrene of each coating (resin and gelcoat) employed in this emissions unit.

   d. The Unified Emissions Factor (UEF) for each coating (resin and gelcoat) employed in this

emissions unit, in pounds of OC/ton of coating employed.

e. The total organic compound emission rate for all coatings (resins and gelcoats), in pounds per day (b/2000 x d).

f. The total number of hours the emissions unit was in operation.

g. The average hourly organic compound emission rate for all coatings, in pounds per hour (e /f).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall collect and record the following cleanup material information for each day for emissions units P001- P006:

a. The company identification for each cleanup material employed.

b. The total combined number of gallons of cleanup material evaporated each day in P001 - P006. Evaporated cleanup material is equal to [the amount of virgin material dispensed plus recycled cleanup material from the previous day] minus [the cleanup material left at the end of the day]. The amount of cleanup material used shall be determined by weighing it.

c. The organic compound content of the cleanup material, in pounds per gallon.

d. The daily combined (OC) emissions from cleanup materials evaporated from P001-P006, in pounds per day (b x c).

e. A record of each liquid organic cleanup material employed in this emissions unit indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5) or contains HAP's as identified in Section 112(b) of the Clean Air Act.

f. The permittee may record the use of cleanup material in pounds per day if the virgin and recycled cleanup material is weighed.

g. The permittee shall retain records of cleanup material analyses for the solvent and solids content of cleanup materials sent out for disposal.

3. The permittee shall maintain monthly records of the updated rolling, 12-month summation for all cleanup materials. This shall include the information for the current month and the preceding eleven months. These monthly records shall include the following information for emissions units: P001 through P006.

a. The company identification for each cleanup material employed in each emissions unit.

b. The sum of the number of gallons (or pounds) of each cleanup material employed in emissions units P001 - P006.

c. The organic compound content each cleanup material, in pounds of OC per gallon.

d. The total organic compound emission rate for all cleanup material, in pounds per month.

e. The amount of cleanup material sent out for disposal and the solvent content of that cleanup material.

f. The rolling,12-month summation of the total cleanup material usage for emissions units P001 through P006.

g. The rolling,12-month summation of the OC emissions from cleanup material for emissions units P001 through P006.

The solvent portion of any cleanup material sent out for disposal can be subtracted from the monthly cleanup material usage totals for emissions units P001-P006.

The permittee has existing cleanup usage records; therefore, cumulative cleanup material usage limits are not needed for the first year of operation after issuance of this permit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the hourly and daily emission limitations in T&C A.I.1.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1. and 2.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the OC content limitation of 6.6 pounds OC per gallon of cleanup material in T&C A.II.4.

4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the styrene content limitations in T&C A.II.7. and 8.

5. The permittee shall submit quarterly reports which specify the total organic compound emissions from cleanup materials for emissions units P001 through P006, and the updated rolling, 12-month summation of OC emissions for each calendar month . These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.

6. The permittee shall notify the Hamilton County Department of Environmental Services in writing of each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] and/or any HAP containing cleanup material was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the

appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

7. The permittee shall submit annual reports which specify the total particulate matter and organic compound emissions from cleanup materials and coatings employed for this emissions unit. These reports shall be submitted by April 15 of each year and cover the previous calendar year.

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

V. Testing Requirements

1. Compliance with the OC emission limitations for coatings (resins and gelcoats) for this emissions unit shall be demonstrated by the recordkeeping required in T&C A. III. 1. and by using the most recent emissions factors from the Unified Emissions Factors for Open Molding of Composites table. The appropriate emissions factors are based on the percent styrene in the coating, by weight, and the method of application. The following shall be used to determine the emissions:

   a. Lbs/day of OC emissions from coatings = lbs. of styrene emitted /ton coating employed X tons coating employed/day

   b. Lbs/hour of OC emissions from coatings = lbs. of styrene emitted /day divided by the hours of operation of the spray guns and/or hand layup brushes.

   c. Ton/year of OC emissions from coatings = the sum of daily OC emissions for the calendar year.

2. Compliance with the combined (OC) emissions limitations from cleanup materials for emissions units P001 - P006 shall be demonstrated by the recordkeeping in T&C A.III.2. and 3. The following shall be used to determine the emissions:

   a. Tons/month of OC emissions from cleanup = the sum of daily OC emissions.

   b. Tons/year of OC emissions from cleanup = the sum of monthly OC emissions based on a rolling, 12-month summation.

3. Compliance with the usage restrictions in T&C A.II.2. of 250 pounds of cleanup material per day per six stations, combined, shall be demonstrated by the recordkeeping in T&C A.III. 2. and reporting in A.IV.1.

4. Compliance with the annual group cleanup emissions limit in A.I.2.b. of 45.63 TPY shall be demonstrated by the recordkeeping in T&C A.III.3 and the reporting in T&C A.IV.1.

5. Compliance with OAC rule 3745-17-08(B) excluding 17-08(B)(9) shall be demonstrated by compliance with OAC rule 3745-17-07(B) utilizing the methods outlined in OAC rules 3745-17-03(B)(1) [Method 9].

6. Compliance with the visible particulate emissions limitation for fugitives and stacks shall be demonstrated by the methods outlined in 40 CFR, Part 60, Appendix A, Method 9.

7. Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of coatings and cleanup materials.

8. Compliance with OAC rule 3745-17-11 and the Table I limit of 1.55 lbs. of PM/PM10 per hour for stack emissions shall be demonstrated using the following equations:

   a. lbs of PM-PM10/Hour = amount of resin plus fiberglass (in pounds per hour) X 0.5 (decimal fraction of resin) X lbs of solids from resins and fiberglass per pound resin X (1-0.75 transfer efficiency) X 0.05 (amount of PM vented to the stack). The fiberglass is assumed to adhere to the product or be captured by the building enclosure.

   b. Tons of PM/Year = Summation of hourly PM emissions X annual hours of operation divided by 2000 pounds per ton.

   Should stack emissions testing be required, the permittee shall employ 40 CFR, Part 60, Appendix A, Methods 1 - 5.

9. Compliance with the styrene content limits in terms A.II.7 and A.II.8 shall be demonstrated by the record keeping in term A.III.1.

VI. Miscellaneous Requirements

1. When 40 CFR, Part 63, Subpart WWWW becomes finalized, the permittee shall comply with all applicable requirements of the rule.

2. If probable cause exists indicating this emissions unit is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring this source into compliance.

3. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emissions unit contained in permit to install 14-04022 as issued on June 2, 1997 and in permit to install 14-05356 as issued on February 25, 2003.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P006 - Station 6 - Fiberglass tank fabrication using spray, filament winding, and hand layup - MODIFICATION	OAC rule 3745-31-05(A)(3)	See term III.I

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P006 was evaluated based on the actual materials(typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the Industrial Source Complex- Short Term (ISCST) version 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC). The MAGLC for resins and gelcoats was based on 7 days a week and five hours per day of operations. The MAGLC for cleanup was based on the maximum allowable and equal to TLV/10.

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Styrene

   TLV (ug/m3): 85,235

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline for emissions units P001-P006 (ug/m3): 3,151.68

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 8,523.5

Pollutant: MMA

TLV (ug/m3): 204,703

Maximum Hourly Emission Rate (lbs/hr): 0.19

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline for emissions units P001-P006 (ug/m3): 378.2

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 20,470.3

Pollutant: Acetone

TLV (ug/m3): 1,187,117

Maximum Hourly Emission Rate (lbs/hr): 100

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline for emissions units P001-P006 (ug/m3):113,268.7

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 118,711.7

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the

handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None