



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
CLERMONT COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

Application No: 14-05838

Fac ID: 1413010484

DATE: 8/3/2006

Composite Engineering
Jim Harrison
1943 US Highway 62, South
Winchester, OH 45697

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. 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 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 may be issued in proposed or 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 a fee of **\$2000** 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, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

HCDES

OH-KY-IN Regional Council of Gov.

IN

KY



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 14-05838

Application Number: 14-05838
Facility ID: 1413010484
Permit Fee: **To be entered upon final issuance**
Name of Facility: Composite Engineering
Person to Contact: Jim Harrison
Address: 1943 US Highway 62, South
Winchester, OH 45697

Location of proposed air contaminant source(s) [emissions unit(s)]:

**2028 State Route 125
Amelia, Ohio**

Description of proposed emissions unit(s):

One resin application spray operation, one gel coat spray operation, and one hand layup area.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Composite Engineering

PTI Application: 14-05838

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 1413010484

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

Composite Engineering
PTI Application: 14-05838

Facility ID: 1413010484

Issued: To be entered upon final issuance

reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See 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 (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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

Issued: To be entered upon final issuance

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

Composite Engineering

PTI Application: 14-05838

Issued: To be entered upon final issuance

Facility ID: 1413010484

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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

Composite Engineering
PTI Application: 14-05838

Facility ID: 1413010484

Issued: To be entered upon final issuance

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 its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. 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

Issued: To be entered upon final issuance

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 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in

9

Composite Engineering

PTI Application: 14-05838

**Issued: To be entered upon final issuance
this permit.**

Facility ID: 1413010484

Composite Engineering

Facility ID: 1413010484

PTI Application: 14-05838

Issued: To be entered upon final issuance

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

1. Compliance Requirements

The emissions unit(s) identified in this Permit 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

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. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of

Composite Engineering
PTI Application: 14-05838

Facility ID: 1413010484

Issued: To be entered upon final issuance

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)

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

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)

Composite Engineering

Facility ID: 1413010484

PTI Application: 14-05838

Issued: To be entered upon final issuance

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

Composite Engineering**Facility ID: 1413010484****PTI Application: 14-05838****Issued: To be entered upon final issuance****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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	20.0
Acetone	6.05
PM/PM10	6.75

14

Composite Engineering

PTI Application: 14-05838

Issued: To be entered upon final issuance

Facility ID: 1413010484

**Comp
PTI A**

Emissions Unit ID: **P001**

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

None

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

None

Comp
PTI A

Emissions Unit ID: **P001**

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, <u>and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P001 - Fiberglass resin spray operation	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2)
		40 CFR Part 63, Subpart WWWW
		OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-11(B)

**Comp
PTI A**Emissions Unit ID: **P001****Issued: To be entered upon final issuance**Applicable Emissions
Limitations/Control Measures

Organic compound emissions shall not exceed 1.43 pounds per hour* and 34.4 pounds per day.

PM10 emissions shall not exceed 0.551 pounds per hour*.

Particulate emissions and PM10 emissions shall not exceed 2.41 tons per year.

See term A.I.2.b.

*The hourly emissions limitation outlined above is based on the emissions unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

The requirements of this rule also compliance with the requirements of 40 CFR Part 63, Subpart WWWW, OAC rule 3745-17-07(A)(1), and OAC rule 3745-17-11(B).

The emissions limitation specified by this rule is less stringent than the emissions limitation established by OAC rule 3745-31-05(A)(3).

See terms A.I.2.c, A.II.1, and A.II.2.

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

0.551 pounds per hour of particulate emissions.

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations.
- 2.b** The organic compound emissions from emissions units P001, P002 and P003 combined shall not exceed 20.0 tons per year.
- 2.c** The permittee shall comply with the following emission limits in pounds of HAP(Hazardous Air Pollutants) per ton of resin for this emissions unit:

<u>Material</u>	<u>Limit</u>
Resin (non corrosion-resistant or high strength)	88

Compliance with the above limit may be based on a rolling 12-month average.

II. Operational Restrictions

1. The permittee shall employ non-HAP containing cleanup materials in this emissions unit.
2. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating (resin or gel coat) employed;
 - b. the amount of each coating (resin or gel coat) employed, in pounds;
 - c. the styrene or organic compound content, recorded in percent weight, of each coating (resin or gel coat); and
 - d. the total organic compound emission rate from all coatings (resin and gel coat), in pounds per day [the summation of (b/2000 pounds/ton) x (emission factor found in the Composite Fabricators Association Unified Emission Factors for Open Molding of Composites) for all resins and gel coats employed during the day].

Emissions Unit ID: **P001**

[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 annual organic compound emissions, in tons per year from emissions units P001, P002, and P003 combined.
3. The permittee shall collect and record the following information for each month for the coating operation:
 - a. the company identification for each coating (resin and gel coat) employed;
 - b. the amount of each coating (resin and gel coat) employed, in pounds;
 - c. the organic HAP content, recorded in percent weight, of each coating (resin and gel coat);
 - d. the organic HAP emissions in pounds per ton calculated using the equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW; and
 - e. the rolling, 12-month average organic HAP emissions limit in pounds per ton using the procedures outlined in 40 CFR 63.5810.
4. The permittee shall maintain a record of the certified statement which states the permittee is in compliance with the work practice standards outlined in term A.II.1 and A.II.2 which was submitted as part of the Notification of Compliance Status as outlined in term A.IV.6.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the organic compound emissions exceeded 34.4 pounds per day, and the actual organic compound emissions for each such day.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and

Issued: To be entered upon final issuance

shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

2. The permittee shall submit an annual report which specifies the total organic compound emissions from emissions unit P001, P002, and P003 combined. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly deviation reports which identify any exceedance of the pounds of HAP(Hazardous Air Pollutants) per ton of resin limitations set forth in term A.I.2.c. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively). If an exceedance does occur the permittee shall also submit the information outlined 40 CFR 63.5910(c)(1) through (c)(4), (d)(1), and (d)(2).

If no exceedances occurred, the permittee shall state so in the report.

4. The permittee shall submit quarterly deviation reports which identify any deviations from the operational restrictions outlined in terms A.II.1 and A.II.2. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively). If an exceedance does occur the permittee shall also submit the information outlined 40 CFR 63.5910(c)(1) through (c)(4), (d)(1), and (d)(2).
5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.
6. The permittee shall submit a Notification of Compliance Status as specified in 40 CFR 63.9(h) no later than 1 year plus 30 days after initial start-up of this emissions unit.

V. Testing Requirements

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

Emissions Unit ID: **P001**

- a. Emission Limitations:
Organic compound emissions shall not exceed 1.43 pounds per hour and 34.4 pounds per day.

Issued: To be entered upon final issuanceApplicable Compliance Method:

Compliance with the hourly emissions limitation is determined based upon the maximum hourly coating usage times the emissions factor as determined in term A.III.1.d. Compliance with the daily organic compound emissions rate shall be determined based on the calculation and record keeping outlined in term A.III.1.

b. Emission Limitations:

The organic compound emissions from emissions P001, P002 and P003 combined shall not exceed 20.0 tons per year.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping outlined in term A.III.2.

c. Emission Limitations:Material

Limit pounds of HAP(Hazardous Air Pollutants) per ton of gel coat

Resin (non corrosion-resistant or high strength)

88

Applicable Compliance Method:

Compliance shall be determined based upon the equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW and the record keeping in term A.III.3. Manufacturer's formulation data and material safety data sheets may be used as long as the procedures outlined in 40 CFR 63.5797 are followed.

d. Emission Limitations:

Particulate emissions and PM10 emissions shall not exceed 0.551 pound per hour and 2.41 tons per year.

Applicable Compliance Method:

Compliance with the hourly emissions limitation is determined based upon the maximum hourly coating usage times the pounds of solids per pound of coating times one minus the transfer efficiency of 45% times one minus the control efficiency of 90%. Compliance with the tons per year limitation is determined by multiplying the hourly limit of 0.551 pounds per hour by 8760 hours per year then dividing by 2000 pounds per ton.

e. Emission Limitations:

**Comp
PTI A**

Emissions Unit ID: **P001**

Issued: To be entered upon final issuance

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

**Comp
PTI A**

Emissions Unit ID: **P001**

Issued: To be entered upon final issuance

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

**Comp
PTI A**

Emissions Unit ID: **P001**

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Fiberglass Resin Spray Operation	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Comp
PTI A

Emissions Unit ID: **P002**

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P002 - Gel Coat Operation	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-07(G)(2) 40 CFR Part 63, Subpart WWWW OAC rule 3745-17-07(A)(1) OAC rule 3745-17-11(B)

Applicable Emissions
Limitations/Control Measures

Organic compound emissions shall not exceed 2.3 pounds per hour*.

PM10 emissions shall not exceed 0.551 pounds per hour*.

Particulate emissions and PM10 emissions shall not exceed 2.41 tons per year.

See term A.I.2.b.

*The hourly emissions limitation outlined above is based on the emissions unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

The requirements of this rule also compliance with the requirements of 40 CFR Part 63, Subpart WWWW, OAC rule 3745-17-07(A)(1), and OAC rule 3745-17-11(B) and the OAC rule 3745-21-07(G)(2) limitation listed in this permitting action.

Organic compound emissions shall not exceed 40 pounds per day.

See terms A.I.2.c, A.II.1, and A.II.2.

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

0.551 pounds per hour of particulate emissions.

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and the use of non-Hazardous Air Pollutant (HAP) containing cleanup materials.
- 2.b** The organic compound emissions from emissions units P001, P002 and P003 combined shall not exceed 20.0 tons per year.
- 2.c** The permittee shall comply with the following emission limits in pounds of HAP(Hazardous Air Pollutants) per ton of gel coat for this emissions unit:

<u>Material</u>	<u>Limit</u>
White/off white pigmented gel coating	267
All other pigmented gel coating	377
Clear production gel coat	522

Compliance with the above limits may be based on a rolling 12-month average.

II. Operational Restrictions

1. The permittee shall employ non-HAP containing cleanup materials in this emissions unit.
2. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

Issued: To be entered upon final issuance**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating (resin and gel coat) employed;
 - b. the amount of each coating (resin and gel coat) employed, in pounds;
 - c. the styrene or organic compound content, recorded in percent weight, of each coating (resin and gel coat); and
 - d. the total organic compound emission rate from all coatings (resin and gel coat), in pounds per day [the summation of (b/2000 pounds/ton) x (emission factor found in the Composite Fabricators Association Unified Emission Factors for Open Molding of Composites) for all resins and gel coats employed during the day].

[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 annual organic compound emissions, in tons per year from emissions units P001, P002, and P003 combined.
3. The permittee shall collect and record the following information for each month for the coating operation:
 - a. the company identification for each coating (resin and gel coat) employed;
 - b. the amount of each coating (resin and gel coat) employed, in pounds;
 - c. the organic HAP content, recorded in percent weight, of each coating (resin and gel coat);
 - d. the organic HAP emissions in pounds per ton for each material employed in term A.1.2.c calculated using the equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW.
 - e. the rolling, 12-month average organic HAP emissions limit in pounds per ton using the procedures outlined in 40 CFR 63.5810.

**Comp
PTI A**

Emissions Unit ID: **P002**

Issued: To be entered upon final issuance

4. The permittee shall maintain a record of the certified statement which states the permittee is in compliance with the work practice standards outlined in term A.II.1 and A.II.2. which was submitted as part of the Notification of Compliance Status as outlined in term A.IV.6.

Issued: To be entered upon final issuance**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

2. The permittee shall submit an annual report which specifies the total organic compound emissions from emissions unit P001, P002, and P003 combined. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly deviation reports which identify any exceedance of the pounds of HAP(Hazardous Air Pollutants) per ton of gel coat limitations set forth in term A.I.2.c. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively). If an exceedance does occur the permittee shall also submit the information outlined 40 CFR 63.5910(c)(1) through (c)(4), (d)(1), and (d)(2).

If no exceedances occurred, the permittee shall state so in the report.

4. The permittee shall submit quarterly deviation reports which identify any deviations from the operational restrictions outlined in terms A.II.1 and A.II.2. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively). If an exceedance does occur the permittee shall also submit the information outlined 40 CFR 63.5910(c)(1) through (c)(4), (d)(1), and (d)(2).
5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.
6. The permittee shall submit a Notification of Compliance Status as specified in 40 CFR

Composite Engineering
PTI Application: 14-05930
Issue

Facility ID: 1413010484

Emissions Unit ID: P002

63.9(h) no later than 1 year plus 30 days after initial start-up of this emissions unit.

Issued: To be entered upon final issuance

V. Testing Requirements

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

a. Emission Limitations:

Organic compound emissions shall not exceed 2.3 pounds per hour and 40 pounds per day.

Applicable Compliance Method:

Compliance with the hourly emissions limitation is determined based upon the maximum hourly coating usage times the emissions factor as determined in term A.III.1.d. Compliance with the daily organic compound emissions rate shall be determined based on the calculation and record keeping outlined in term A.III.1.

b. Emission Limitations:

The organic compound emissions from emissions P001, P002 and P003 combined shall not exceed 20.0 tons per year.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping outlined in term A.III.2.

c. Emission Limitations:

<u>Material</u>	<u>Limit</u> pounds of HAP(Hazardous Air Pollutants) per ton of gel coat
White/off white pigmented gel coating	267
All other pigmented gel coating	377
Clear production gel coat	522

Applicable Compliance Method:

Compliance shall be determined based upon the equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW and the record keeping in term A.III.3. Manufacturer's formulation data and material safety data sheets may be used as long as the procedures outlined in 40 CFR 63.5797 are followed.

d. Emission Limitations:

Particulate emissions and PM10 emissions shall not exceed 0.551 pound per hour and 2.41 tons per year.

Issued: To be entered upon final issuanceApplicable Compliance Method:

Compliance with the hourly emissions limitation is determined based upon the maximum hourly coating usage times the pounds of solids per pound of coating times one minus the transfer efficiency of 45% times one minus the control efficiency of 90%. Compliance with the tons per year limitation is determined by multiplying the hourly limit of 0.551 pounds per hour by 8760 hours per year then dividing by 2000 pounds per ton.

e. Emission Limitations:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - Gelcoat Operation	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Comp
PTI A

Emissions Unit ID: P003

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	WWWW
P003 - Hand Layup Area	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-21-07(G)(2)	
	40 CFR Part 63, Subpart	

**Comp
PTI A**Emissions Unit ID: **P003****Issued: To be entered upon final issuance**Applicable Emissions
Limitations/Control Measures

Organic compound emissions shall not exceed 2.5 pounds per hour*.

See term A.I.2.b

*The hourly emissions limitation outlined above is based on the emissions unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

The requirements of this rule also compliance with the requirements of 40 CFR Part 63, Subpart WWWW and the OAC rule 3745-21-07(G)(2) limitation listed in this permitting action.

Organic compound emissions shall not exceed 40 pounds per day.

See terms A.I.2.c, A.II.1, and A.II.2.

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations.
- 2.b** The organic compound emissions from emissions units P001, P002 and P003

Issued: To be entered upon final issuance

combined shall not exceed 20.0 tons per year.

- 2.c** The permittee shall comply with the following emission limits in pounds of HAP(Hazardous Air Pollutants) per ton of resin for this emissions unit:

<u>Material</u>	<u>Limit</u>
Resin (corrosion-resistant or high strength)	123

Compliance with the above limit may be based on a rolling 12-month average.

II. Operational Restrictions

1. The permittee shall employ non-HAP containing cleanup materials in this emissions unit.
2. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating (resin and gel coat) employed;
 - b. the amount of each coating (resin and gel coat) employed, in pounds;
 - c. the styrene or organic compound content, recorded in percent weight, of each coating (resin and gel coat);
 - d. the total organic compound emission rate from all coatings (resin and gel coat), in pounds per day [the summation of (b/2000 pounds/ton) x (emission factor found in the Composite Fabricators Association Unified Emission Factors for Open Molding of Composites) for all resins and gel coats employed during the day]

[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 annual organic compound emissions, in tons per year from emissions units P001, P002, and P003 combined.

3. The permittee shall collect and record the following information for each month for the coating operation:
 - a. the company identification for each coating (resin and gel coat) employed;
 - b. the amount of each coating (resin and gel coat) employed, in pounds;
 - c. the organic HAP content, recorded in percent weight, of each coating (resin and gel coat);
 - d. the organic HAP emissions in pounds per ton calculated using the equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW.
 - e. the rolling, 12-month average organic HAP emissions limit in pounds per ton using the procedures outlined in 40 CFR 63.5810.
4. The permittee shall maintain a record of the certified statement which states the permittee is in compliance with the work practice standards outlined in term A.II.1 and A.II.2. which was submitted as part of the Notification of Compliance Status as outlined in term A.IV.6.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

2. The permittee shall submit an annual report which specifies the total organic compound emissions from emissions unit P001, P002, and P003 combined. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly deviation reports which identify any exceedance of the pounds of HAP(Hazardous Air Pollutants) per ton of resin limitations set forth in

Issued: To be entered upon final issuance

term A.I.2.c. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively). If an exceedance does occur the permittee shall also submit the information outlined 40 CFR 63.5910(c)(1) through (c)(4), (d)(1), and (d)(2).

If no exceedances occurred, the permittee shall state so in the report.

4. The permittee shall submit quarterly deviation reports which identify any deviations from the operational restrictions outlined in terms A.II.1 and A.II.2. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively). If an exceedance does occur the permittee shall also submit the information outlined 40 CFR 63.5910(c)(1) through (c)(4), (d)(1), and (d)(2).
5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.
6. The permittee shall submit a Notification of Compliance Status as specified in 40 CFR 63.9(h) no later than 1 year plus 30 days after initial start-up of this emissions unit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitations:
Organic compound emissions shall not exceed 2.5 pounds per hour and 40 pounds per day.

Applicable Compliance Method:
Compliance with the hourly emissions limitation is determined based upon the maximum hourly coating usage times the emissions factor as determined in term A.III.1.d. Compliance with the daily organic compound emissions rate shall be determined based on the calculation and record keeping outlined in term A.III.1.
 - b. Emission Limitations:
The organic compound emissions from emissions P001, P002 and P003

Emissions Unit ID: **P003**

combined shall not exceed 20.0 tons per year.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping outlined in term A.III.2.

c. Emission Limitations:

Material

Limit pounds of HAP(Hazardous Air Pollutants) per ton of gel coat

Resin (corrosion-resistant or high strength)

123

Applicable Compliance Method:

Compliance shall be determined based upon the equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW and the record keeping in term A.III.3. Manufacturer's formulation data and material safety data sheets may be used as long as the procedures outlined in 40 CFR 63.5797 are followed.

VI. Miscellaneous Requirements

None

Comp
PTI A

Emissions Unit ID: P003

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P003 - Hand Layup Area	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Comp
PTI A

Emissions Unit ID: **P004**

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P004 - Facility wide cleanup operation	OAC rule 3745-31-05(A)(3)	<p>The acetone emissions shall not exceed 4.8 pounds per hour.*</p> <p>The acetone emissions shall not exceed 6.05 tons per year.</p> <p>See term A.II.1</p> <p>*The hourly emissions limitation outlined above is based on the emission unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.</p> <p>The requirements of this rule also compliance with the requirements of 40 CFR Part 63, Subpart WWWW.</p>
	40 CFR Part 63, Subpart WWWW	See term A.II.3.

2. Additional Terms and Conditions

Comp
PTI A

Emissions Unit ID: **P004**

Issued: To be entered upon final issuance

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with acetone usage limits and the emission limitations.

Issued: To be entered upon final issuance**II. Operational Restrictions**

1. The maximum annual acetone usage (amount evaporated) shall not exceed 1833 gallons per year.
2. The use of photochemically reactive cleanup material as defined in OAC rule 3745-21-01(C)(5) is prohibited.
3. The permittee shall employ non-HAP containing cleanup materials in this emissions unit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the organic compound content of each cleanup material, in pounds per gallon;
 - d. the total acetone/organic compound emission rate for all cleanup materials, in pounds per month (b x c); and
 - e. documentation on whether or not each organic cleanup material is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

[Note: The definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

2. The annual acetone usage and emissions shall be determined by summing the monthly usage and emissions listed in term A.III.1.b and A.III.1.d.
3. The permittee shall maintain a record of the certified statement which states the permittee is in compliance with the work practice standards outlined in term A.II.3 which was submitted as part of the Notification of Compliance Status as outlined in term A.IV.5.

IV. Reporting Requirements

Emissions Unit ID: **P004**

1. The permittee shall submit an annual report which specifies the total acetone usage (amount evaporated) in gallons. These reports shall be submitted by January 31 of each year.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material (as defined in OAC rule 3745-21-01(C)(5)) was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
3. The permittee shall submit quarterly deviation reports which identify any deviations from the operational restrictions outlined in term A.II.3. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively). If an exceedance does occur the permittee shall also submit the information outlined 40 CFR 63.5910(c)(1) through (c)(4), (d)(1), and (d)(2).
4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.
5. The permittee shall submit a Notification of Compliance Status as specified in 40 CFR 63.9(h) no later than 1 year plus 30 days after initial start-up of this emissions unit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitations:
Acetone emissions shall not exceed 4.8 pounds per hour.

Applicable Compliance Method:
Compliance with the hourly emissions limitation is determined based upon the maximum hourly acetone usage times 6.6 pounds per gallon.
 - b. Emission Limitations:
The acetone emissions shall not exceed 6.05 tons per year.

**Comp
PTI A**

Emissions Unit ID: **P004**

Issued: To be entered upon final issuance

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping outlined in term A.III.2.

2. Compliance with the usage limitation in term A.II.1 shall be determined by the record keeping in term A.III.1.

VI.. Miscellaneous Requirements

None

Comp
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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P004 - Facility wide cleanup operation	Air Toxics Policy	See term B.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 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: acetone
 TLV (ug/m3): 1,187,000
 Maximum Hourly Emission Rate (lbs/hr): 4.8

Emissions Unit ID: **P004**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5951
MAGLC (ug/m3): 28,265

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic 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 applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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) meet(s) the definition of a "modification" under other provisions of the rule, 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 still satisfy the "Air Toxic Policy":

**Comp
PTI A**

Emissions Unit ID: **P004**

Issued: To be entered upon final issuance

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where 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

51

Comp
PTI A

Emissions Unit ID: **P004**

Issued: To be entered upon final issuance

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P005 - Sanding Operation	OAC rule 3745-31-05(A)(3)	Particulate matter emissions (PE) and particulate matter emissions less than 10 microns in diameter (PM) shall not exceed 0.44 pound per hour.
		Particulate matter emissions (PE) and particulate matter emissions less than 10 microns in diameter (PM) shall not exceed 1.93 tons per year.
		Visible particulate emissions from any stack shall not exceed 10 percent opacity as a six-minute average.
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than

**Comp
PTI A**

Emissions Unit ID: **P005**

Issued: To be entered upon final issuance

the emission limitation
established pursuant to OAC
rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emissions limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:
0.44 lb/hr PE; 1.93 TPY PE

Applicable Compliance Method:

Hourly emissions of particulate emissions (PE) shall be calculated and compliance determined using the following equations:

$$\text{lb PE/hr} = 0.2 \text{ units/hour (maximum)} \times 220 \text{ square feet per unit} \times 0.1 \text{ cubic inches per square foot (scuff depth)} \times 0.10 \text{ lb per cubic inches.}$$

If testing is required to determine compliance with the with the hourly particulate emissions limitation, then testing shall be conducted using the following method: Methods 1-5 of 40 CFR, Part 60, Appendix A.

Annual emissions of particulate emissions (PE) shall be calculated and

Comp
PTI A

Emissions Unit ID: **P005**

Issued: To be entered upon final issuance

compliance determined using the equation above multiplied by 8760 hr/year and divided by 2000 lbs/ton.

- b. Emissions Limitations:
0.44 lb/hr PM10; 1.93 TPY PM10

**Comp
PTI A**Emissions Unit ID: **P005****Issued: To be entered upon final issuance**

Applicable Compliance Method:

Hourly emissions of particulate matter emissions less than 10 microns in diameter (PM10) shall be calculated and compliance determined using the following equations:

$$\text{lb PM10/hr} = 0.2 \text{ units/hour (maximum)} \times 220 \text{ square feet per unit} \times 0.1 \text{ cubic inches per square foot (scuff depth)} \times 0.10 \text{ lb per cubic inches.}$$

If testing is required to determine compliance with the with the hourly particulate emission limitation, then testing shall be conducted using the following method: Methods 1-4 of 40 CFR, Part 60, Appendix A, and Method 201 of 40 CFR 51, Appendix M.

Annual emissions of particulate matter less than or equal to 10 microns in diameter (PM10) shall be calculated and compliance determined using the equation above multiplied by 8760 hr/year and divided by 2000 lbs/ton.

- c. Emissions Limitations:
Visible particulate emissions from the stack outlet shall not exceed ten percent (10%) opacity, as a six minute average.

Applicable Compliance Method:

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002.

VI. Miscellaneous Requirements

None

Comp
PTI A

Emissions Unit ID: P005

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P005 - Sanding Operation	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None