



State of Ohio Environmental Protection Agency

**RE: FINAL 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: 14-05474**

**DATE: 3/9/2004**

Cincinnati Fiberglass  
John Glass  
4174 Half Acre Road  
Batavia, OH 45103

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

HCDES

Dr. Janet Rickabaugh Clermont County General Health District

Alan Lloyd NSR group under Mike Hopkins

Matthew Rau USEPA - Region 5



**Permit To Install  
Terms and Conditions**

**Issue Date: 3/9/2004  
Effective Date: 3/9/2004**

**FINAL PERMIT TO INSTALL 14-05474**

Application Number: 14-05474  
APS Premise Number: 1413020248  
Permit Fee: **\$200**  
Name of Facility: Cincinnati Fiberglass  
Person to Contact: John Glass  
Address: 4174 Half Acre Road  
Batavia, OH 45103

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

**4174 Half Acre Road  
Batavia Ohio, Ohio**

Description of proposed emissions unit(s):

**Modification to P030.**

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

## 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**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

### **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**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) 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**

<u>Pollutant</u>	<u>Tons Per Year</u>
PM/PM <sub>10</sub>	0.60
OC	17.9

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Cincinnati Fiberglass

PTI Application: **14-05474**

**Issued: 3/9/2004**

Facility ID: **1413020248**

**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

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P030 - Robotic gel coat applicator booth, with a dry filtration system (an open molding operation as defined in 40 CFR Part 63, Subpart WWWW as part of a reinforced plastic composites production facility)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-11(B)
	OAC rule 3745-21-07(G)(9)(g)
	40 CFR Part 63 Subpart WWWW

Applicable Emissions  
Limitations/Control  
Measures

0.39 lb/hr of particulate emissions (PM)/particulate matter with a diameter of 10 microns or less (PM<sub>10</sub> emissions)  
6.07 lbs/day of PM/PM<sub>10</sub> emissions  
0.60 ton per year (TPY) of PM/PM<sub>10</sub> emissions.

See Sections A.II.6.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(9)(g), OAC rule 3745-17-07(A)(1) and 40 CFR Part 63 Subpart WWWW.

10.1 lbs/hr of organic compound (OC) emissions from gel coats (polyester resin materials );

157 lbs/day of OC emissions from gel coats;

15.5 TPY of OC emissions from gel coats, based on a rolling 12-month summation;

13.2 lbs/day of acetone; and

2.4 TPY of acetone.

See Sections A.II.1 - A.II.5, A.II.7 and A.II.8.

Visible particulate emissions from any stack shall not

exceed 20% opacity, as a six-minute average, except as specified by rule.

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

See Sections A.I.2.b, A.II.9 and A.II.10.

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the gel coat usage limitations, cleanup material, including acetone usage limitations, OC emission limitations and compliance with 40 CFR Part 63, Subpart WWWW.

**2.b** The permittee shall comply with the following emission limitations in pounds of hazardous air pollutants (HAP) per ton of gel coat for this emissions unit:

Material	Limitation*
White/off white Pigmented Gel Coat	267
All other Pigmented Gel Coat	377
Clear Production Gel Coat	522

**II. Operational Restrictions**

1. The maximum amount of acetone (cleanup material) employed in this emissions unit shall not exceed 2.0 gallons/day and 720 gallons/year.
2. The styrene content of the gel coats (gel coat is a polyester resin material surface coating, either pigmented or clear, that provides a cosmetic enhancement and improves resistance to degradation from exposure to the elements) shall not exceed the following limitations:
  - a. 50%, by weight, as applied for each clear gel coat (clear gel coat is gel coat without pigment); and
  - b. 45%, by weight, as applied for each pigmented gel coat. (pigmented gel coat is clear gel coat with pigments added).
3. The amount of gel coat used in this emissions unit shall not exceed 144 lbs/hour, 2,248 lbs/day and 220.95 tons/year. The tons/year limitation is based upon a rolling, 12-month summation.
4. The permittee shall only employ acetone as the cleanup material in emissions unit P030. The maximum OC content of the acetone (cleanup material) employed in this emissions unit shall not exceed 6.6 lbs of OC/gallon.
5. The permittee shall not employ any photochemically reactive cleanup material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.
6. The permittee shall operate and maintain a dry filtering system to control PM from this emissions unit.
7. The permittee shall electronically monitor the amount of gel coat pumped by this emissions unit.

8. The permittee shall only utilize robotic application equipment in this emissions unit.
9. The permittee shall keep containers that store HAP materials closed or covered except during the addition or removal of materials.
10. The permittee shall employ non-HAP containing cleanup materials in emissions unit P030.

### III. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
  - a. The company identification for each polyester resin material (gel coat) and cleanup material employed;
  - b. The type and amount of each polyester resin material employed, in lbs (clear or pigmented gel coat);
  - c. The styrene content, recorded in percent by weight, of each polyester resin material employed;
  - d. The total number of gallons of acetone employed;
  - e. The OC content of the acetone employed, in lbs/gallon;
  - f. The daily OC emissions from the acetone employed, in lbs [(d) x (e)];
  - g. The daily OC/HAP emissions from all polyester resin materials employed, in lbs [the summation of (b/2000 lbs/ton) x (emission factor found in the Unified Emission Factor (UEF) Table 1\*) for all polyester resin materials employed during the day];
  - h. The total PM/PM<sub>10</sub> emissions for all polyester resin materials employed, in lbs/day [summation of (b) x (1 - styrene content, percent by weight as applied) x 0.25 (25% over spray) x (1 - 0.985, the control efficiency of the dry filtration system)]\*\*;
  - i. The total number of hours this emissions unit was in operation;
  - j. The average hourly organic compound emission rate for all gel coats, in lbs/hour [(g)/(i)];
  - k. The average hourly PM/PM<sub>10</sub> emission rate for all gel coats employed in lbs/hour [(h)/(i)];

- l. The average hourly usage rate for all gel coats, in lbs/hour [(b)/(i)];
- m. A determination whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-05(C)(5).

[Note: The polyester resin material information must be for the polyester resin materials as employed, including any thinning solvents added at the emissions unit. Also, the definitions of nonphotochemically reactive is based upon OAC rule 3745-21-01(C)(5)].

\* The correct emission factor based on the styrene content of the resin employed found in the Unified Emission Factor (UEF) Table 1 from "The Technical Discussion of the Unified Emission Factors for Open Molding of Composites" (dated July 23, 2001 or the most recent update) shall be used.

\*\* The 25% over spray and 98.5% control efficiency were used to establish the PM/PM<sub>10</sub> emission rates established in this PTI and are based on conservative engineering assumptions.

2. The permittee shall collect and record the following information for each month for this emissions unit:
  - a. The total number of gallons of acetone employed [summation of A.III.1.d for all days of the calendar month];
  - b. The total OC emissions from the acetone employed, in lbs [summation of A.III.1.f for all days of the calendar month];
  - c. The total OC emissions from all the polyester resin materials employed, in tons [summation of A.III.1.g for all days of the calendar month, and divided by 2,000 lbs/ton];
  - d. The total amount of each type of polyester resin material employed, in tons [summation of A.III.1.b for each type of polyester resin material employed for all days of the calendar month, and divided by 2,000 lbs/ton];
  - e. The total HAP (styrene) emission rate, in lbs, from each type of polyester resin material employed [summation of A.III.1.g for all days of the calendar month];
  - f. The organic HAP (styrene) emission rate, in lbs of HAP/ton of polyester resin material employed, for each type of polyester resin material defined in Section A.I.2.b [(e)/(d) for each type of polyester resin material ];

- g. If the permittee switches to any gel coats which do not comply with the limits in Section A.I.2.b then the permittee shall maintain the lbs of HAP/ton based on a 12-month rolling average;
- h. The total PM/PM<sub>10</sub> emissions for all polyester resin materials employed, in tons [summation of A.III.1.h for all days of the calendar month, and divided by 2,000 lbs/ton];
- i. The rolling, 12-month summation of the polyester resin material usage figures; and
- j. The rolling, 12-month summation of the OC emissions from gel coats.

The permittee already has existing polyester resin material usage records, therefore cumulative polyester resin material usage records are not needed for the first year.

- 3. The permittee shall maintain annual records of the following information for this emissions unit:
  - a. The total number of gallons acetone employed [summation of A.III.2.a for each month of the calendar year];
  - b. The total OC emissions from the acetone in tons [summation of A.III.2.b for each month of the calendar year, divided by 2,000 lbs/ton]; and
  - c. The total PM/PM<sub>10</sub> emissions, in tons [summation of A.III.2.h for each month of the calendar year and divided by 2,000 lbs/ton].
- 4. The permittee shall maintain a certified statement that the permittee is in compliance with the work practice standard in T&C A.II.9.
- 5. The permittee shall maintain a copy of each notification and report submitted to comply with 40 CFR Part 63 Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted according to the requirements in 40 CFR 63.10(b)(2)(xiv).

#### IV. Reporting Requirements

- 1. The permittee shall submit semi-annual compliance (deviation) reports that identify all exceedances of the following:
  - a. The daily acetone usage restriction;
  - b. The OC content limitation for the acetone (lbs/gallon);
  - c. The daily OC emission limitation for the acetone;

- d. The hourly OC emission limitation for polyester resin materials ;
- e. The daily OC emission limitation for polyester resin materials ;
- f. The hourly and/or daily PM/PM<sub>10</sub> emission limitations;
- g. The organic HAP emission limitation (lbs/ton) for each polyester resin material in term A.I.2.b;
- h. The operational restrictions in term A.II.9 and A.II.10;
- i. The hourly gel coat usage limitation;
- j. The daily gel coat usage limitation;
- k. The rolling, 12-month gel coat usage limitation;
- l. The styrene content limitations as applied in term A.II.2.

The reports shall be postmarked or delivered by January 31 and July 31 of each year and cover the previous six calendar months (July through December and January through June). If no exceedances occurred during the reporting period, the permittee shall state so in the deviation report.

The compliance report shall also include the following information:

- a. Company name and address;
- b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and
- c. Date of the report and the beginning and ending dates of the reporting period.

If any deviations occur, the permittee shall include the following in the report:

- a. The total operating time of the emissions unit during the reporting period; and
- b. Information on the number of deviations and cause of deviations (including unknown cause, if applicable), as applicable and the corrective action taken.

Emissions Unit ID: P030

2. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services that specify the following:
  - a. The total amount, in gallons, of acetone employed for the calendar year;
  - b. The total OC emissions from acetone, in tons, for the calendar year; and
  - c. The annual OC and PM/PM<sub>10</sub> emissions from this emissions unit.

This report shall be submitted by January 31 of each year and cover the previous calendar year.

3. The permittee shall submit a notification of compliance status which contains the requirements in 40 CFR 63.9(h). This notification shall be submitted as outlined in Table 13 of 40 CFR Part 63 Subpart WWW. The notification of compliance status shall also include a certified statement which says that all cleaning materials contain no HAP. There shall also be a certified statement which says that all HAP-containing storage containers are kept closed or covered except when adding or removing materials.

## V. Testing Requirements

1. Compliance with the emission limitations and material usage restrictions specified in Sections A.I.1, A.I.2 and A.II shall be determined by the following methods:

- a. Emission Limitations:

10.1 lbs/hr of OC emissions from polyester resin materials ; 157 lbs/day of OC emissions from polyester resin materials ; 15.5 TPY of OC emissions from polyester resin materials for this emissions unit, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the hourly OC emission limitation shall be determined by the record keeping requirements specified in Section A.III.1.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, 18 and 25.

Compliance with the daily OC emission limitation shall be determined by the record keeping requirements specified in Section A.III.1.

Compliance with the annual OC emission limitation shall be determined by the record keeping requirements specified in Section A.III.2.

- b. Emission Limitations:

13.2 lbs/day of OC emissions from acetone; and  
2.4 TPY of OC emissions from acetone.

Applicable Compliance Method:

Compliance with the daily OC emission limitations shall be determined by the record keeping requirements specified in Section A.III.1.

Compliance with the annual OC emission limitation shall be determined by the record keeping requirements specified in Section A.III.3.

c. Emission Limitation:

6.6 lbs of OC/gallon, for acetone.

Applicable Compliance Method: Compliance with the OC content limitation shall be determined by the record keeping requirements specified in Section A.III.1. Formulation data or U.S. EPA Method 24 shall be used to determine the OC content of any cleanup material, including acetone employed in emissions unit P030.

d. Material Usage Restrictions:

2.0 gallons/day of acetone; 720 gallons/year of , acetone.

Applicable Compliance Method: Compliance with the daily acetone usage restriction shall be determined by the record keeping requirements specified in Section A.III.1. Compliance with the annual acetone usage restriction shall be determined by the record keeping requirements specified in Section A.III.3.

e. Emission Limitations:

0.39 lb/hour of PM/PM<sub>10</sub> emissions

6.07 lbs/day of PM/PM<sub>10</sub> emissions

0.6 TPY of PM/PM<sub>10</sub> emissions

Applicable Compliance Method:

Compliance with the hourly PM/PM<sub>10</sub> emission limitation shall be determined by the record keeping requirements specified in Section A.III.1.

If required, the permittee shall demonstrate compliance with the hourly PM/PM<sub>10</sub> emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1-5.

Compliance with the daily PM/PM<sub>10</sub> emission limitation shall be determined by the record keeping requirements specified in Section A.III.1.

Compliance with the annual PM/PM<sub>10</sub> emission limitation shall be determined by the record keeping requirements specified in Section A.III.3.

f. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions 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).

g. Emission Limitation:

The permittee shall comply with the following emission limits in pounds of organic hazardous air pollutants (HAP) per ton of gel coat for this emissions unit:

Material	Limit
White/off white Pigmented Gel Coating	267
All other Pigmented Gel Coating	377
Clear Production Gel Coat	522

Applicable Compliance Method:

Compliance shall be demonstrated using the procedures in 40 CFR 63.5810 on a 12-month rolling average or by demonstrating that each gel coat meets the above emission limits and the record keeping in term A.III.2.

h. Emission Limitation:

50%, by weight, styrene as applied for each clear gel coat; and (clear gel coat is gel coat without pigment); and

45%, by weight, styrene as applied for each pigmented gel coat.

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(pigmented gel coat is clear gel coat with pigments added).

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Applicable Compliance Method:

The percent styrene content shall be determined by formulation data, USEPA Reference Method 24 or USEPA Method 311. When Method 24 is used, the weight percent styrene content shall be taken to be the weight percent volatiles of the uncatalyzed resin. In the event of a dispute between the formulation data and Method 24, the results obtained by Method 24 shall be used and supersede the formulation data. In the event of a dispute between the formulation data, Method 24 and/or Method 311, the results obtained by Method 311 shall be used and supersede the formulation data and/or the Method 24 test results. An alternative method may be substituted if agreed to in writing by USEPA.

i. Emission Limitation:

The amount of gel coat used in this emissions unit shall not exceed 144 lbs/hour, 2,248 lbs/day and 220.95 tons/year

Applicable Compliance Method:

Compliance with the gel coat usage limitations shall be determined by the record keeping requirements specified in Sections A.III.1 and A.III.2

## **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>
P030 - Robotic Gel Coat Applicator Booth (an open molding operation as defined in 40 CFR Part 63, Subpart WWW as part of a reinforced plastic composites production facility)		

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

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Emissions Unit ID: P030

**VI. Miscellaneous Requirements**

None