



5/6/2015

PAUL HEMKER
DYNAMIC PLASTICS INC
8207 STATE RTE 121
NEW PARIS, OH 45347

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0868070055
Permit Number: P0107992
Permit Type: Renewal
County: Preble

Certified Mail

Yes	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Register Herald. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435.

Sincerely,

Erica R. Engel-Ishida, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
RAPCA; Indiana; Kentucky



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Dynamic Plastics, Inc. is a small reinforced plastic composite parts manufacturer located near New Paris, Ohio. Three fiberglass spray and hand layup booths are used for coating molded plastics parts using styrene based gel coat and resins. Dynamic Plastics applied for a renewal federally enforceable permit- to-operate (FEPTIO) for emissions units K001, K002 and K003.

3. Facility Emissions and Attainment Status:

Dynamic Plastics is located in Preble County which is currently classified as attainment with all National Ambient Air Quality Standards (NAAQS). The facility is non major for VOC and a synthetic minor source for hazardous air pollutants (HAPs) to avoid 40 CFR Part 63, Subpart WWWW and Title V permitting requirements. The facility HAPs emissions are limited to 9.9 TPY for any individual HAP, and 24.9 TPY for any combination of HAPs. The VOC emissions from K001 through K003 are limited to less than 10 tons per year.

4. Source Emissions:

Styrene (a HAP) contained in the resin and gel coating materials is the primary source of emissions for these units. The potential styrene emissions from the facility are represented in the following table. In addition to the styrene, there is a small amount (less than 1 ton/year) of VOC emissions that can occur from cleanup materials.

Potential Emissions		
	Styrene (lbs/hr)	Styrene (tons/year)
K001	3.35	14.67
K002	2.70	11.83
K004	7.06	30.92
Totals	13.11	57.42

This permit specifies synthetic minor emissions limitations for the individual and combined HAPs. It also, establishes a material usage restriction and a combined VOC emissions limitation that limits the facility's VOC emissions from all reinforced plastic composites production operations to less than 10 tons/year. The facility's federally enforceable potential to emit established in this permit is summarized in the following table.



Established Potential To Emit			
	Material usage restriction (tons/year)	Styrene (tons)	Volatile Organic Compounds (tons)
K001	65	9.18	9.18
K002	65	9.18	9.18
K004	65	9.18	9.18
Cleanup ¹	-	-	0.36
K001-K003, combined	65	9.18	9.57 ¹

¹ Includes clean up emissions of 0.36 tpy and accounts for all three EUIDs.

5. Conclusion:

Dynamic Plastics will be issued a FEPTIO that limits the HAPs emissions to 9.9 TPY for any individual HAP, and 24.9 TPY for any combination of HAPs, and that limits the VOC emissions to 9.57 tons/year, each on a 12-month rolling basis. The facility will continue to avoid 40 CFR Part 63 Subpart WWWW, Title V permitting and OAC rule 3745-21-25 requirements.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	9.57

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install and Operate Renewal
DYNAMIC PLASTICS INC

8207 STATE RTE 121,,NEW PARIS, OH 45347

ID#:P0107992

Date of Action: 5/6/2015

Permit Desc:Renewal FEPTIO for three fiberglass resin spray, gelcoat spray and hand layup booths: emissions units K001, K002 and K003..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Dale Davidson, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280. Ph: (937)225-4435



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
DYNAMIC PLASTICS INC**

Facility ID:	0868070055
Permit Number:	P0107992
Permit Type:	Renewal
Issued:	5/6/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
DYNAMIC PLASTICS INC

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Draft Permit-to-Install and Operate

DYNAMIC PLASTICS INC

Permit Number: P0107992

Facility ID: 0868070055

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0868070055
Application Number(s): A0041647
Permit Number: P0107992
Permit Description: Renewal FEPTIO for three fiberglass resin spray, gelcoat spray and hand layup booths: emissions units K001, K002 and K003.
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 5/6/2015
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

DYNAMIC PLASTICS INC
8207 STATE RTE 121
NEW PARIS, OH 45347

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

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

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Permit-to-Install and Operate

DYNAMIC PLASTICS INC

Permit Number: P0107992

Facility ID: 0868070055

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0107992

Permit Description: Renewal FEPTIO for three fiberglass resin spray, gelcoat spray and hand layup booths: emissions units K001, K002 and K003.

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

Emissions Unit ID:

Company Equipment ID:

Superseded Permit Number:

General Permit Category and Type:

K001

fiberglass resin spray, gelcoat spray, and hand layup booth

08-04524

Not Applicable

Emissions Unit ID:

Company Equipment ID:

Superseded Permit Number:

General Permit Category and Type:

K002

fiberglass resin spray, gelcoat spray, and hand layup booth

08-04524

Not Applicable

Emissions Unit ID:

Company Equipment ID:

Superseded Permit Number:

General Permit Category and Type:

K003

fiberglass resin spray, gelcoat spray, and hand layup booth

08-04524

Not Applicable



Draft Permit-to-Install and Operate
DYNAMIC PLASTICS INC
Permit Number: P0107992
Facility ID: 0868070055
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Regional Air Pollution Control Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Draft Permit-to-Install and Operate
DYNAMIC PLASTICS INC
Permit Number: P0107992
Facility ID: 0868070055
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. Synthetic Minor HAPs Emissions Limitations

The emissions of hazardous air pollutants (HAPs), as defined in Section 112(b) of Title III of the Clean Air Act, from all the emissions units at this facility, shall not exceed 9.9 TPY for any individual HAP, as a rolling, 12-month summation, and 24.9 TPY for any combination of HAPs, as a rolling 12-month summation.
3. The permittee shall keep records for the entire facility each month of the following information:
 - a) The name and identification of each cleanup material or any other HAP containing material employed which is not used in 3.f) or 3.g);
 - b) The identification of each individual HAP contained in each material identified in 3.a) and the pound(s) of each HAP per gallon;
 - c) The number of gallons of each material identified in 3.a) employed during the month;
 - d) For each individual HAP, the emissions, in ton(s) [i.e., for each individual HAP, the summation of the products of 3.b) times 3.c) for all materials employed during the month divided by 2,000 pounds];
 - e) The total combined HAPs emissions, in ton(s) [i.e., the summation of all the individual HAPs emissions from 3.d) above for all the materials employed during the month];
 - f) The emissions (and associated calculations) for each individual HAP, in tons, calculated by the sum of the individual HAP emission rates from all the emissions units at the facility using the equations in table 1 to Subpart WWWW of 40CFR 63 or any HAP emissions factor approved by U.S. EPA;
 - g) The emissions (and associated calculations) for all combined HAPs, in tons, calculated by summing all combined HAPs emission rates from all the emissions units at the facility using the equations in table 1 to Subpart WWWW of 40CFR 63 or any VOC emissions factor approved by U.S. EPA;
 - h) The total facility-wide emissions for each individual HAP, in tons [i.e., the sum of individual HAP emissions rates calculated in 3.d) and 3.f)];



- i) The total facility-wide emissions for combined HAPs, in tons, [i.e., the sum of combined HAPs emissions rates calculated in 3.e) and 3.g)];
 - j) The rolling 12-month sum of the total individual HAP emissions rates for each HAP from the facility, in tons, [i.e., sum of the individual HAPs emissions rates calculated in 3.h) for the previous 12 months];
 - k) The rolling 12-month sum of the total combined HAP emissions rates from the facility, in tons, [i.e. the sum of combined HAP emissions rates calculated in 3.i) for the previous 12 months].
4. The permittee shall submit quarterly deviation (excursion) reports, in accordance with Part I of the Standard Terms and Conditions, of this permit, of the following information:
- a) An identification of each month during which the rolling, 12-month individual HAP emissions rate (from the facility) exceeded 9.9 tons, and the actual rolling, 12-month sum of each individual HAP emissions rate (from the facility) for each such month.
 - b) An identification of each month during which the rolling, 12-month combination of all HAP emissions rates (from the facility) exceeded 24.9 tons, and the actual rolling, 12-month sum of the combination of all HAP emissions rates (from the facility) for each such month.
- If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.
- The quarterly reports shall be submitted, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency). Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
5. The permittee shall submit annual reports that summarize the annual emissions of each individual HAP and the combined emissions of all the HAPs for the facility. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Synthetic Minor Title V Fee Emission Report.
6. All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.



7. Compliance with the emission limitations in B.2. shall be determined in accordance with the following methods:

a) Emissions Limitation:

The individual HAP emissions from the facility shall not exceed 9.9 tons on a rolling 12-month basis.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in B.3. for each individual HAP.

b) Emissions Limitation:

The combined HAP emissions from the facility shall not exceed 24.9 tons on a rolling 12-month basis.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in B.3. for the combination of all HAPs.



Draft Permit-to-Install and Operate
DYNAMIC PLASTICS INC
Permit Number: P0107992
Facility ID: 0868070055
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group -fiberglass parts manufacturing: K001, K002, K003,

EU ID	Operations, Property and/or Equipment Description
K001	fiberglass resin spray, gelcoat spray, and hand layup booth
K002	fiberglass resin spray, gelcoat spray, and hand layup booth
K003	fiberglass resin spray, gelcoat spray, and hand layup booth

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)e.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>The volatile organic compound (VOC) emissions from each emissions unit shall not exceed the following:</p> <p><u>K001:</u> 4.24 lbs/hour, excluding cleanup.</p> <p><u>K002:</u> 7.06 lbs/hour, including cleanup..</p> <p><u>K003:</u> 7.06 lbs/hour, excluding cleanup.</p> <p>See b)(2)a.</p>



Draft Permit-to-Install and Operate

DYNAMIC PLASTICS INC

Permit Number: P0107992

Facility ID: 0868070055

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>The VOC emissions for K001 through K003, combined, shall not exceed 9.57 tons/year, including cleanup materials.</p> <p>Compliance with this rule also includes compliance with the requirements of OAC rules 3745-21-25 and 3745-31-05(D).</p>
b.	<p>OAC rule 3745-31-05(D) (synthetic minor to avoid 40 CFR Part 63, Subpart WWWW, Title V and OAC rule 3745-21-25 requirements)</p>	<p>The emissions of hazardous air pollutants (HAPs) from all the emissions units at this facility shall not exceed 9.9 TPY for any individual HAP, as a rolling, 12-month sum, and 24.9 TPY for any combination of HAPs, as a rolling 12-month sum. See Section B.2. through B.5. of the Facility-Wide Terms and Conditions.</p> <p>The VOC emissions for K001 through K003, combined, shall not exceed 9.57 tons/year, including cleanup materials, on a 12-month rolling basis. See b)(2)b.</p> <p>The gel coat and resin usage for K001 through K003, combined shall not exceed 65 tons, based on a rolling 12-month basis. See c)(1)</p>
d.	<p>OAC rule 3745-21-25</p>	<p>In accordance with OAC rule 3745-21-25(A)(2)(e), any facility that has the potential to emit of VOC less than 10.0 tons per year for all reinforced plastic composites operations combined is excluded from the requirements of this rule, except for the recordkeeping requirements specified in paragraph (A)(2)(e) of the rule.</p> <p>See b)(2)c. and b)(2)d.</p>
e.	<p>OAC rule 3745-114-01 ORC 3704.03(F)</p>	<p>See d)(4) through d)(7) and e)(3).</p>

(2) Additional Terms and Conditions

- a. The hourly emissions limitation for each emission unit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.



- b. Separate accounting for cleanup operations associated with each emissions unit K001, K002 and K003 is not necessary. Recordkeeping of the total cleanup material usage and cleanup emissions for these units are accounted for in the monitoring and recordkeeping requirements of the permit.
 - c. This facility is an existing source as defined in paragraph (F)(1) of OAC rule 3745-21-25. Federally enforceable limitations established for K001, K002, and K003 in an earlier Permit-To-Install issued before and in effect prior to December 14, 2009 limited the total VOC emissions from these emissions units to less than 10 tons/year. Taking into account the federally enforceable rolling 12-month limitations specified in this permit, the facility's potential to emit for VOC for all reinforced plastic composites production operations combined are established to be less than 10 tons/year.
 - d. The permittee shall maintain an up-to-date record of the potential to emit for VOC from all reinforced plastic composites production operations in accordance with procedures specified in paragraph (E) of OAC rule 3745-21-25 and procedure described in d)(1)e.
- c) Operational Restrictions
- (1) The gel coat and resin usage for K001 through K003, combined shall not exceed 65 tons, based on a rolling 12-month basis.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall record the following information for each month for each emissions unit K001, K002 and K003:
 - a. The company identification of each resin gel coat, catalyst and organic compound additives employed;
 - b. The weight, in pounds, of each resin and gel coat, as applied;
 - c. The organic compound concentration of each resin and gel coat, as applied, in percent by weight;
 - d. The type of molding and method of application for each resin and gel coat applied (e.g., open molding, mechanical, manual or filament application);
 - e. The VOC emission factor for each resin and gel coat employed, in pounds VOC per ton of gel coat or resin employed calculated using the equations in table 1 to Subpart WWWW of 40CFR 63 or any VOC emissions factor approved by U.S. EPA;
 - f. The VOC emissions, in pounds [d)(1)b. multiplied by d)(1)e. for each resin and gel coat applied];
 - g. The total VOC emissions from all resins and gels coats applied, in pounds [sum of d)(1)(f) for each resin and gel coat];



- h. The total weight of resin and gel coat, in tons applied [sum of d)(1)b. divided by 2000 pond/ton].

Resin and gel coat use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The monomer content records may be based on MSDS or on resin specifications supplied by the resin supplier.

- (2) The permittee shall record the following information for each month for K001 through K003 for purposes of showing compliance with the materials usage restriction and VOC limitation:
 - a. The name and identification of each cleanup material employed;
 - b. The VOC content of each cleanup material, in pounds per gallon;
 - c. The volume, in gallons, of each cleanup material employed;
 - d. The VOC emissions from all cleanup materials employed, in pounds, [the sum of d)(2)b. times d)(2)c. for all cleanup materials employed];
 - e. The combined sum of the total VOC emissions rate, in pounds, for each emissions units K001, K002 and K003 determined in d)(1)g. above;
 - f. The total combined VOC emissions rate, including cleanup, in tons [sum of [d)(2)(d. + d)(2)e.] divided by 2000 pound/ton];
 - g. The 12-month rolling summation of the total combined VOC emissions rate, including cleanup, in tons [rolling 12-month summation of d)(2)f.];
 - h. The combined sum of the total weight, in tons, of resin and gel applied for emissions units K001, K002 and K003 determined in d)(1)h. above;
 - i. The 12-month rolling summation of the total combined weight, in tons, of resin and gel applied [rolling 12-month summation of d)(2)h].
- (3) The permittee shall maintain an up-to-date record of the potential to emit for VOC emissions from all reinforced plastic composites production operations. Prior to making any physical changes to or changes in the method of operation of the emissions unit that could result the potential to emit of VOC for all reinforced plastic composites operations combined at the facility to equal or exceed 10.0 tons per year, the permittee shall apply for and obtain a final PTIO prior to implementing the change.
- (4) The FEPTIO application for emissions units K001, K002 and K003 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable



Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X= 8" hours per day and "Y =7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: styrene

TLV (mg/m³): 85.202

Maximum Hourly Emission Rate (lbs/hr): 18.36

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 5515

MAGLC (ug/m³): 6086

The permittee, has demonstrated that emissions of styrene, from emissions units K001, K002 and K003, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall



not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (5) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" 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 a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F),



initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

- d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

- (7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall include in the PER any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (4) The permittee shall immediately notify the appropriate district office or local air agency any time the potential to emit of VOC for all reinforced plastic composites operations combined at the facility equals or exceeds 10.0 tons per year.
- (5) The permittee shall submit quarterly reports that identify all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating



parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit when the emission units as in operation:

- a. any exceedance of the combined 12-month rolling VOC emission rate limitation specified in b)(1) above for emissions units K001 through K003,
- b. any exceedance of the combined 12-month rolling gel coat and resin usage restriction specified in b)(1) and c)(1) above for emissions units K001 through K003.

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) Testing Requirements

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

a. Emissions Limitation:

K001: The VOC emissions from this emissions unit shall not exceed 4.24 lbs/hour, excluding cleanup.

K002: The VOC emissions from this emissions unit shall not exceed 7.06 lbs/hour, excluding cleanup.

K003: The VOC emissions from this emissions unit shall not exceed 7.06 lbs/hour, excluding cleanup.

Applicable Compliance Method:

The hourly emissions limitations were developed by multiplying the maximum hourly gel coat usage (K001 - 30 lbs/hour; K002 - 50 lbs/hour; K003 - 50 lbs/hour) by the maximum styrene emissions factor using Table 1 to Subpart WWW of 40 CFR 63 (282.6 pounds styrene/ton resin). These hourly rates represent the potential to emit for these emissions units, therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

b. Emissions Limitation:

The VOC emissions for K001 through K003, combined, shall not exceed 9.57 tons/year, including cleanup materials.



Applicable Compliance Method:

This 12-month rolling limitations were determined using the combined annual restriction on the gel coat/resin usage for K001 through K003 (65 tons) multiplied by the maximum styrene emissions factor for these units using Table 1 to Subpart WWWW of 40 CFR 63 (282.6 pounds styrene/ton resin) and dividing by 2000 lbs/ton.

Compliance with this limitation shall be demonstrated by complying with the rolling 12-month limitation specified in b)(1) and f)(1)c.

c. Emissions Limitation:

The VOC emissions for K001 through K330, combined, shall not exceed 9.57 tons/year, including cleanup materials, on a 12-month rolling basis.

Applicable Compliance Method:

Compliance shall be demonstrated through monitoring and recordkeeping requirements specified in d)(1) and d)(2).

d. Emissions Limitation:

The gel coat and resin usage for K001 through K003, combined, shall not exceed 65 tons, based on a rolling 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated through monitoring and recordkeeping requirements specified in d)(1) and d)(2).

e. Emissions Limitation:

In accordance with OAC rule 3745-21-25(A)(2)(e), any facility that has the potential to emit of VOC less than 10.0 tons per year for all reinforced plastic composites operations combined is excluded from the requirements of this rule, except for the recordkeeping requirements specified in paragraph (A)(2)(e) of the rule.

Applicable Compliance Method:

Compliance shall be demonstrated through monitoring and recordkeeping requirements specified in d)(3).

g) Miscellaneous Requirements

- (1) None.