Ohio Environmental Protection Agency

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

5/26/2016

Certified Mail

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

Robert Disanza
Tencom, Ltd.
P.O. Box 176
Holland, OH 43528

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0448002099
Permit Number: P0120778
Permit Type: Administrative Modification
County: Lucas

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF 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.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Toledo Department of Environmental Services at (419)936-3015 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: TDES

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Tencom, Ltd.

Facility ID:	0448002099
Permit Number:	P0120778
Permit Type:	Administrative Modification
Issued:	5/26/2016
Effective:	5/26/2016
Expiration:	12/4/2020

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Tencom, Ltd.

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Authorization

Facility ID:	0448002099
Application Number(s):	M0003943
Permit Number:	P0120778
Permit Description:	Administrative modification of permit P0119243 to simplify facility-wide monitoring and recordkeeping requirements, without any changes to emissions limits or emissions factors.
Permit Type:	Administrative Modification
Permit Fee:	$100.00
Issue Date:	5/26/2016
Effective Date:	5/26/2016
Expiration Date:	12/4/2020

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Tencom, Ltd.
7134 Railroad Street
Holland, OH 43528

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:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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

Authorization (continued)

Permit Number: P0120778
Permit Description: Administrative modification of permit P0119243 to simplify facility-wide monitoring and recordkeeping requirements, without any changes to emissions limits or emissions factors.

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

Emissions Unit ID:	**P001**
Company Equipment ID:	P001
Superseded Permit Number:	P0119243
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	P002
Superseded Permit Number:	P0119243
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P003**
Company Equipment ID:	P003
Superseded Permit Number:	P0119243
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P004**
Company Equipment ID:	P004
Superseded Permit Number:	P0119243
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P005**
Company Equipment ID:	P005
Superseded Permit Number:	P0119243
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P006**
Company Equipment ID:	P006
Superseded Permit Number:	P0119243
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P007**
Company Equipment ID:	P007
Superseded Permit Number:	P0119243
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P008**
Company Equipment ID:	P008
Superseded Permit Number:	P0119243
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P009**
Company Equipment ID:	P009
Superseded Permit Number:	P0119243
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	**P010**
Company Equipment ID:	P010
Superseded Permit Number:	P0119243
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P011**
Company Equipment ID:	P011
Superseded Permit Number:	P0119243
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P012**
Company Equipment ID:	P012
Superseded Permit Number:	P0119243
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P013**
Company Equipment ID:	P013
Superseded Permit Number:	P0119243
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P014**
Company Equipment ID:	Pultrusion Line 2-6
Superseded Permit Number:	P0119243
General Permit Category and Type:	Not Applicable

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 [DO/LAA] 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 beingpermanently shut down without first applying for and obtaining a permit pursuantto 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.

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) 2.a)(1).

2. Facility-wide restrictions:

   a) Applicable Emissions Limitations:

      (1) Under the authority of OAC rule 3745-31-05(D):

         (a) The combined emissions of hazardous air pollutants (HAP) from all emissions units at this facility shall not exceed 9.9 tons per year of individual HAP and 24.9 tons of total HAP, as a rolling, 12-month summation.

         A listing of HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Toledo Division of Environmental Services.

         (b) The combined emissions of volatile organic compounds (VOC) for all reinforced plastic composites production operations located at this facility shall not exceed 9.9 tons as a rolling, 12-month summation.

         (c) The maximum VOC content for all resin pastes mixed for use in reinforced plastic composites pultrusion line operations shall not exceed 36.81 percent by weight.

         (d) The total combined weight of VOC in all resin pastes mixed for use in reinforced plastic composites pultrusion line operations facility-wide shall not exceed 198 tons as a rolling, 12-month summation.

   b) Operational Restrictions

      (1) The permittee shall utilize no materials emitting VOCs for clean-up.

      (2) The permittee shall utilize no materials emitting HAPs for clean-up.

   c) Monitoring and/or Recordkeeping Requirements:

      (1) The permittee shall maintain an up-to-date record of the potential to emit for VOC from all reinforced plastic composites production operations, and shall employ emission factors or emission estimates in the calculation of the potential to emit that meet the requirements of OAC rule 3745-21-25(E).

(2) The permittee shall collect and record the following information for each month to demonstrate compliance with the limitations for the combined emissions of volatile organic compounds (VOC) for all reinforced plastic composites production operations located at this facility:

(a) the company identification for each VOC-containing resin paste component employed facility-wide;

(b) the weight of each VOC-containing resin paste component employed facility-wide, in pounds per month;

(c) the VOC content of each VOC-containing resin paste component employed facility-wide, in percent by weight expressed as a decimal fraction (e.g. 10% = 0.1);

(d) the total combined weight of VOC in all resin paste components employed facility-wide, in tons per month, calculated as the monthly summation of the individual VOC content of each resin paste component, ∑((b) x (c))/2000.

(e) the combined weight of VOC in all resin pastes components employed facility-wide, in tons per rolling, 12-month period for all reinforced plastic composites production operations located at this facility, calculated by adding the current months' total combined weight of VOC components employed (d) to the combined weight of VOC employed facility-wide recorded during the previous 11-month period.

(3) This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit. The permittee shall collect and record the following information for each month to demonstrate compliance with the limitations for the emissions of HAPs for all emissions units located at this facility:

(a) the company identification for each HAP-containing resin paste component employed facility-wide;

(b) the pounds of each HAP-containing resin paste component employed per month facility-wide;

(c) the HAP content of each HAP-containing resin paste component employed facility-wide, in percent by weight of each HAP, expressed as a decimal fraction (e.g. 10% = 0.1);

(d) the total weight of each HAP in all resin paste components employed facility-wide, in tons per month, calculated as the monthly summation of the individual HAP content of each resin paste component, ∑((b) x (c))/2000;

(e) the total emissions of each individual HAP from all mixers facility-wide calculated as the total weight of each HAP employed (d) multiplied by the mixer emission factor (0.01 based on an assumed similarity to paint mixers as specified in specified in STAAPA/ALAPCO/USEPA reference document Methods for

Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-5, dated February 2005), in tons per month;

(f) the total emissions of individual HAPs from all pultrusion lines calculated as the total weight of individual HAP mixed (d) multiplied by the pultrusion line emission factor (0.04 as specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emissions Factors, Chapter 4.4-2 dated 2/07), in tons per month;

(g) the monthly emissions of each individual HAP for all reinforced plastic composites production operations located at this facility calculated as the summation of the respective total monthly individual HAP emission rates for all mixers and pultrusion lines, ((e) + (f)), in tons per month;

(h) the annual individual HAP emissions, in tons per rolling, 12-month period, for all reinforced plastic composites production operations located at this facility, calculated by adding the current months' individual HAP emissions (g) to the monthly individual HAP emissions recorded during the previous 11-month period;

This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit; and

(i) the annual combined HAP emissions, in tons per rolling, 12-month period, for all reinforced plastic composites production operations located at this facility, calculated as the summation of the annual individual HAP emissions, ∑(h)

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Toledo Division of Environmental Services. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials.

(4) The permittee shall collect and record the following information for all clean-up materials utilized at this facility:

(a) the company identification for each cleanup material employed; and

(b) an identification of whether or not each clean-up material employed emits a VOC or HAP.

d) Reporting Requirements:

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

(a) 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:

i. 9.9 tons of VOC as a rolling, 12-month summation for all reinforced plastic composites production operations located at this facility;

ii. 36.81 percent by weight maximum VOC content for all resin pastes mixed for use in reinforced plastic composites pultrusion line operations;

iii. 198 tons as a rolling, 12-month summation for the total combined weight of VOC in all resin pastes mixed for use in reinforced plastic composites pultrusion line operations facility-wide;

iv. 9.9 tons of individual HAP as a rolling, 12-month summation from all emissions units at this facility;

v. 24.9 tons of total HAP as a rolling, 12-month summation from all emissions units at this facility; and

vi. Clean up materials shall utilize no materials emitting VOCs or HAPs.

(b) the probable cause of each deviation (excursion);

(c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

(d) the magnitude and duration of each deviation (excursion).

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).

(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) 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.

e) Testing Requirements

(1) Compliance with the Emissions Limitations specified in section 2.a) of these terms and conditions shall be determined in accordance with the following methods:

(a) Emission Limitation:

9.9 tons as a rolling, 12-month summation of VOC emissions for all reinforced plastic composites production operations located at this facility.

Applicable Compliance Method:

This emission limitation is based on the worst case operating conditions as follows: multiply the maximum allowable mixer facility-wide VOC throughput rate (198 tons per year) by the worst case VOC emissions factor (0.01 + 0.04 = 0.05), based on the assumption that all VOC in resin pastes are processed twice – once in a mixer and then in a pultrusion line. The mixer VOC emissions factor (0.01) based on an assumed similarity to paint mixers as specified in specified in STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-5, dated February 2005. The pultrusion line VOC emissions factor (0.04) has been accepted by Ohio EPA and is based on USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 4.4, Table 4.4-2 dated 2/07.

Therefore, if compliance is shown with maximum allowable mixer facility-wide VOC throughput rate (198 tons per year); compliance will also be shown with this emissions limitation. Compliance shall be demonstrated based on the recordkeeping requirements of c)(2).

Where required, VOC content and emissions factors shall be determined in accordance with the methods and procedures of OAC rule 3745-21-25.

(b) Emission Limitation:

36.81 percent by weight maximum VOC content for all resin pastes mixed for use in reinforced plastic composites pultrusion line operations

Applicable Compliance Method:

Compliance with this emission limit shall be demonstrated by the recordkeeping set forth in c)(2).

(c) Emission Limitation:

198 tons as a rolling, 12-month summation for the total combined weight of VOC in all resin pastes mixed for use in reinforced plastic composites pultrusion line operations facility-wide

Applicable Compliance Method:

Compliance with this emission limit shall be demonstrated by the recordkeeping set forth in c)(2).

(d) Emission Limitation:

9.9 tons of individual HAP as a rolling, 12-month summation from all emissions units at this facility

Applicable Compliance Method:

Compliance with this emission limit shall be demonstrated by the recordkeeping set forth in c)(3).

Where required, the testing and evaluation requirements contained in 40 CFR part 63, subpart SS, and 63.5850 shall be used to determine organic HAP emission factors for any operation.

(e) Emission Limitation:

24.9 tons of total HAP as a rolling, 12-month summation from all emissions units at this facility

Applicable Compliance Method:

Compliance with this emission limit shall be demonstrated by the recordkeeping set forth in c)(3).

Where required, the testing and evaluation requirements contained in 40 CFR part 63, subpart SS, and 63.5850 shall be used to determine organic HAP emission factors for any operation.

C. Emissions Unit Terms and Conditions

1. P004

Operations, Property and/or Equipment Description:

Pultrusion Line 1-2 Fiberglass Resin Composite Antennas

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., d)(1) through d)(4) and e)(2)

(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) (PTI 04-01441, issued 4/20/2006)	Volatile organic compound (VOC) emissions shall not exceed 0.36 pound per hour and 1.59 tons per year.
		See b)(2)a.
b.	OAC rule 3745-31-05(D)	See B.2.
c.	40 CFR Part 63 Subparts A and WWWW	Exempt per B.2.a)(1)(a)
d.	OAC rule 3745-21-25(A)(2)(e)	Exempt per B.2.a)(1)(b)
		See b)(2)b.
e.	ORC 3704.03(F)(4)(c)	See d)(1) through d)(4)

(2) Additional Terms and Conditions

a. The VOC emission limitations for this emissions unit were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

b. The permittee shall maintain an up-to-date record of the potential to emit for VOC from all reinforced plastic composites production operations, and shall employ emission factors or emission estimates in the calculation of the potential to emit that meet the requirements of OAC rule 3745-21-25(E).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The FEPTIO application for this emissions unit, P004, 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 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" hours per day and "Y" 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 x 8/X x 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

Maximum Hourly Emission Rate (lbs/hr): 15.51

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 775

MAGLC (ug/m3): 2028.6

The permittee, has demonstrated that emissions of styrene, from emissions unit P004, is calculated to be less than eighty per cent of the 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).

(2) 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 FEPTIO 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.

(3) 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.

(4) 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.

(5) The permittee shall retain a copy of all records on-site, including calculations and supporting information for at least 5 years.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) The permittee shall include 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.

(3) 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.

f) Testing Requirements

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

a. Emission Limitation:

0.36 pound of VOC per hour

Applicable Compliance Method:

This emission limitation was established as the potential to emit for this emissions unit by a one-time calculation at the worst case operating conditions as follows: multiply the maximum allowable resin VOC content (36.81 percent by weight) by the maximum design throughput rate (24.67 pounds of resin paste per hour) and by the worst case VOC emissions factor (0.04) as specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 4.4, Table 4.4-2 dated 2/07.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60 Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

b. Emission Limitation:

1.59 tons of VOC per year

Applicable Compliance Method:

This emission limitation was established as the potential to emit for this emissions unit by a one-time calculation at the worst case operating conditions as follows: multiply the maximum hourly emission rate (0.36 pound per hour) by the maximum annual hours of operation (8,760 hours) and divide by 2,000 pounds per ton.

g) Miscellaneous Requirements

(1) None.

2. P013

Operations, Property and/or Equipment Description:

Pultrusion Line 2-5 Fiberglass Resin Composite CB Antennas

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., d(1) through d)(4) and e)(2)

(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) (PTI 04-01441, issued 4/20/2006)	Volatile organic compound (VOC) emissions shall not exceed 0.19 pound per hour and 0.83 ton per year.
		See b)(2)a.
b.	OAC rule 3745-31-05(D)	See B.2.
c.	40 CFR Part 63 Subparts A and WWWW	Exempt per B.2.a)(1)(a)
d.	OAC rule 3745-21-25(A)(2)(e)	Exempt per B.2.a)(1)(b)
		See b)(2)b.
e.	ORC 3704.03(F)(4)(c)	See d)(1) through d)(4).

(2) Additional Terms and Conditions

a. The VOC emission limitations for this emissions unit were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

b. The permittee shall maintain an up-to-date record of the potential to emit for VOC from all reinforced plastic composites production operations, and shall employ emission factors or emission estimates in the calculation of the potential to emit that meet the requirements of OAC rule 3745-21-25(E).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The FEPTIO application for this emissions unit, P013, 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 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" hours per day and "Y" 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 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

Maximum Hourly Emission Rate (lbs/hr): 15.51

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 775

MAGLC (ug/m3): 2028.6

The permittee, has demonstrated that emissions of styrene, from emissions unit P013, is calculated to be less than eighty per cent of the 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).

(2) 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 FEPTIO 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.

(3) 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 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.

(4) 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.

(5) The permittee shall retain a copy of all records on-site, including calculations and supporting information for at least 5 years.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) The permittee shall include 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.

(3) 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.

f) Testing Requirements

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

a. Emission Limitation:

0.19 pound of VOC per hour

Applicable Compliance Method:

This emission limitation was established as the potential to emit for this emissions unit by a one-time calculation at the worst case operating conditions as follows: multiply the maximum allowable resin VOC content (36.81 percent by weight) by the maximum design throughput rate (12.71 pounds of resin paste per hour) and by the worst case VOC emissions factor (0.04) as specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 4.4, Table 4.4-2 dated 2/07.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60 Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

b. Emission Limitation:

0.83 ton of VOC per year

Applicable Compliance Method:

This emission limitation was established as the potential to emit for this emissions unit by a one-time calculation at the worst case operating conditions as follows: multiply the maximum hourly emission rate (0.19 pound per hour) by the maximum annual hours of operation (8,760 hours) and divide by 2,000 pounds per ton.

g) Miscellaneous Requirements

(1) None.

3. P014, Pultrusion Line 2-6

Operations, Property and/or Equipment Description:

Pultrusion Line 2-6 Fiberglass Resin Composite CB Antennas

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)f., d)(1) through d)(4) and e)(2)

(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)c.

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) June 30, 2008	Volatile organic compounds (VOC) emissions shall not exceed 0.27 ton per month averaged over a rolling, 12-month period.
		See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	See b)(2)c.
c.	OAC rule 3745-31-05(D)	See B.2.
d.	40 CFR Part 63 Subparts A and WWWW	Exempt per B.2.a)(1)(a)
e.	OAC rule 3745-21-25(A)(2)(e)	Exempt per B.2.a)(1)(b)
		See b)(2)d.
f.	ORC 3704.03(F)(4)(c)	See d)(1) through d)(4).

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administration Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii)

(the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

b. The VOC emission limitation for this emissions unit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

c. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source due to the federally enforceable restriction of 9.9 tons of VOC per rolling, 12-month period per B.2.

d. The permittee shall maintain an up-to-date record of the potential to emit for VOC from all reinforced plastic composites production operations, and shall employ emission factors or emission estimates in the calculation of the potential to emit that meet the requirements of OAC rule 3745-21-25(E).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The FEPTIO application for this emissions unit, P014, 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" hours per day and "Y" 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

Maximum Hourly Emission Rate (lbs/hr): 0.73

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 311.5

MAGLC (ug/m3): 2023.8

The permittee, has demonstrated that emissions of styrene, from emissions unit P014, is calculated to be less than eighty per cent of the 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).

(2) 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 FEPTIO 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.

(3) 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.

(4) 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.

(5) The permittee shall retain a copy of all records on-site, including calculations and supporting information for at least 5 years.

e) Reporting Requirements

(1) 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.

(2) The permittee shall include 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.

(3) 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.

f) Testing Requirements

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

a. Emission Limitation:

0.27 ton of VOC per month averaged over a rolling, 12-month period

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit using the worst case batch formulation for VOC content and maximum throughput of product. This emission limitation is calculated by multiplying the maximum linear speed for product at 4.5 linear feet per minute times 60 minutes per hour times 0.1828 pounds of product per linear foot. This

result is then multiplied by the maximum allowable percent of VOC containing styrene resin (36.81%) in the product. The result is then multiplied by an emission factor to calculate the amount of VOC released during processing. The pultrusion line VOC emissions factor (0.04) has been accepted by Ohio EPA and is based on USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 4.4, Table 4.4-2 dated 2/07. This results in the maximum release of VOC in pounds per hour. Multiply by 8,760 hours per year and divide by 2,000 pounds per ton. Then divide by 12 months per year to calculate the maximum emissions per month averaged over a 12-month period.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60 Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. The derived pounds per hour would be multiplied by 8,760 hours per year and divide by 2,000 pounds per ton. Then divide by 12 months per year to calculate the maximum emissions per month averaged over a 12-month period. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group -Mixers: P001,P002,

EU ID	Operations, Property and/or Equipment Description
P001	Resin Paste Mixer 1
P002	Resin Paste Mixer 2

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)g., d)(3) through d)(6) and e)(2)

(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) (PTI 04-01441, issued 4/20/2006)	Volatile organic compound (VOC) emissions shall not exceed 1.62 pounds per hour and 7.09 tons per year from each emissions unit.
		See b)(2)a.
		Particulate emissions (PE) shall not exceed 0.024 pound per hour and 0.1 ton per year from each emissions unit.
		Visible emissions shall not exceed 0% opacity as a 6-minute average.
b.	OAC rule 3745-31-05(D)	See B.2.
c.	40 CFR Part 63 Subparts A and WWWW	Exempt per B.2.a)(1)(a)
d.	OAC rule 3745-17-07(A)	See b)(2)b.
e.	OAC rule 3745-17-11(B)	See b)(2)b.
f.	OAC rule 3745-21-25(A)(2)(e)	Exempt per B.2.a)(1)(b)
		See b)(2)c.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	ORC 3704.03(F)(4)(c)	See d)(3) through d)(6)

(2) Additional Terms and Conditions

a. The VOC emission limitations for this emissions unit were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

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

c. The permittee shall maintain an up-to-date record of the potential to emit for VOC from all reinforced plastic composites production operations, and shall employ emission factors or emission estimates in the calculation of the potential to emit that meet the requirements of OAC rule 3745-21-25(E).

c) Operational Restrictions

(1) The permittee shall operate the particulate control, fabric filter system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record on a daily basis whether or not the particulate control, fabric filter system, was in service when the emissions unit was in operation.

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the

observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(3) The FEPTIO application for these emissions units, P001 and P002, were 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" hours per day and "Y" 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

Maximum Hourly Emission Rate (lbs/hr): 15.51

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 775

MAGLC (ug/m3): 2028.6

The permittee, has demonstrated that emissions of styrene, from emissions units P001 and P002 are 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).

(4) 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.).

(5) 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.

(6) 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.

(7) The permittee shall retain a copy of all records on-site, including calculations and supporting information for at least 5 years.

e) Reporting Requirements

(1) 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.

(2) The permittee shall include 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.

(3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(2) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

(4) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the fabric filter system during the 12-month reporting period for this/these emissions unit(s):

a. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse.

(5) 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.

f) Testing Requirements

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

a. Emission Limitation:

1.62 pounds of VOC per hour from each emissions unit

Applicable Compliance Method:

This emission limitation was established as the potential to emit for this emissions unit by a one-time calculation at the worst case operating conditions as follows: multiply the maximum allowable resin VOC content (36.81 percent by weight) by the maximum design throughput rate (440 pounds of resin paste per hour) and by the worst case VOC emissions factor (0.01) based on an assumed similarity to paint mixers as specified in specified in STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-5, dated February 2005.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60 Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

b. Emission Limitation:

7.09 tons of VOC per year from each emissions unit

Applicable Compliance Method:

This emission limitation was established as the potential to emit for this emissions unit by a one-time calculation at the worst case operating conditions as follows: multiply the maximum hourly emission rate (1.62 pounds per hour) by the maximum annual hours of operation (8,760 hours) and divide by 2,000 pounds per ton.

c. Emission Limitation:

0.024 pound of PE per hour from each emissions unit

Applicable Compliance Method:

Compliance shall be based upon the following equation:

E(PE) = P x CONCsolid x EF(PE) x (1-CE)

where:

E(PE) = particulate emissions, in pounds per hour;

P = maximum mix production rate, which is 440 pounds per hour as noted in the permit application;

CONCsolid = maximum solids concentration in the mix, which is 237.34 pounds of filler per 440 pound batch as noted in the permit application;

EF(PE) = Emission factor of 0.01 based on an assumed similarity to paint mixers as specified in STAAPA/ALAPCO/USEPA reference document “Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities”, page 8.5-5, dated February 2005.; and

CE = efficiency of PE control device is 99.0%, or 0.99, as specified in the permit application.

If required, compliance shall be determined through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A, or other US EPA- approved test methods, with prior approval from the Ohio EPA.

d. Emission Limitation:

0.1 ton of PE per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.024 pound per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

e. Emission Limitation:

VE shall not exceed 0% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9.

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group -Pultrusion GRoup 2: P005,P006,P007,

EU ID	Operations, Property and/or Equipment Description
P005	Pultrusion Line 1-3 Fiberglass Resin Composite Antennas
P006	Pultrusion Line 1-4 Fiberglass Resin Composite Antennas
P007	Pultrusion Line 1-5 Fiberglass Resin composite Antennas

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., d)(1) through d)(4) and e)(2)

(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) (PTI 04-01441, issued 4/20/2006)	Volatile organic compound (VOC) emissions shall not exceed 0.73 pound per hour and 3.18 tons per year for each emissions unit.
		See b)(2)a.
b.	OAC rule 3745-31-05(D)	See B.2.
c.	40 CFR Part 63 Subparts A and WWWW	Exempt per B.2.a)(1)(a)
		Exempt per B.2.a)(1)(b)
d.	OAC rule 3745-21-25(A)(2)(e)	See b)(2)b.
e.	ORC 3704.03(F)(4)(c)	See d)(1) through d)(4)

(2) Additional Terms and Conditions

a. The VOC emission limitations for this emissions unit were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is

not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

b. The permittee shall maintain an up-to-date record of the potential to emit for VOC from all reinforced plastic composites production operations, and shall employ emission factors or emission estimates in the calculation of the potential to emit that meet the requirements of OAC rule 3745-21-25(E).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The FEPTIO application for these emissions units, P005, P006, and P007 were 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" hours per day and "Y" 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 x 8/X x 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

Maximum Hourly Emission Rate (lbs/hr): 15.51

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 775

MAGLC (ug/m3): 2028.6

The permittee, has demonstrated that emissions of styrene, from emissions units P005, P006, and P007 are 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).

(2) 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 FEPTIO 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.

(3) 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.

(4) 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.

(5) The permittee shall retain a copy of all records on-site, including calculations and supporting information for at least 5 years.

e) Reporting Requirements

(1) 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.

(2) The permittee shall include 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.

(3) 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.

f) Testing Requirements

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

a. Emission Limitation:

0.73 pound of VOC per hour for each emissions unit

Applicable Compliance Method:

This emission limitation was established as the potential to emit for this emissions unit by a one-time calculation at the worst case operating conditions as follows: multiply the maximum allowable resin VOC content (36.81 percent by weight) by the maximum design throughput rate (49.35 pounds of resin paste per hour) and by the worst case VOC emissions factor (0.04) as specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 4.4, Table 4.4-2 dated 2/07.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60 Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

b. Emission Limitation:

3.18 tons of VOC per year for each emissions unit

Applicable Compliance Method:

This emission limitation was established as the potential to emit for this emissions unit by a one-time calculation at the worst case operating conditions as follows: multiply the maximum hourly emission rate (0.73 pound per hour) by the maximum annual hours of operation (8,760 hours) and divide by 2,000 pounds per ton.

g) Miscellaneous Requirements

(1) None.

6. Emissions Unit Group -Pultrusion Group 1: P003,P008,P009,P010,P011,P012,

EU ID	Operations, Property and/or Equipment Description
P003	Pultrusion Line 1-1 Fiberglass Resin Composite CB antennas
P008	Pultrusion Line 1-N Fiberglass Resin Composite CB Antennas
P009	Pultrusion Line 2-1 Fiberglass Resin Composite Pultrusion Line
P010	Pultrusion Line 2-2 Fiberglass Resin Composite CB Antennas
P011	Pultrusion Line 2-3 Fiberglass Resin Composite CB Antennas
P012	Pultrusion Line 2-4 Fiberglass Resin Composite CB Antennas

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., d)(1) through d)(4) and e)(2)

(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) (PTI 04-01441, issued 4/20/2006)	Volatile organic compound (VOC) emissions shall not exceed 1.59 pounds per hour and 6.96 tons per year for each emissions unit.
		See b)(2)a.
b.	OAC rule 3745-31-05(D)	See B.2.
c.	40 CFR Part 63 Subparts A and WWWW	Exempt per B.2.a)(1)(a)
d.	OAC rule 3745-21-25(A)(2)(e)	Exempt per B.2.a)(1)(b)
		See b)(2)b.
e.	ORC 3704.03(F)(4)(c)	See d)(1) through d)(4).

(2) Additional Terms and Conditions

a. The VOC emission limitations for this emissions unit were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

b. The permittee shall maintain an up-to-date record of the potential to emit for VOC from all reinforced plastic composites production operations, and shall employ emission factors or emission estimates in the calculation of the potential to emit that meet the requirements of OAC rule 3745-21-25(E).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The FEPTIO application for these emissions units, P003, P008, P009, P010, P011, and P012 were 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" hours per day and "Y" 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

Maximum Hourly Emission Rate (lbs/hr): 15.51

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 775

MAGLC (ug/m3): 2028.6

The permittee, has demonstrated that emissions of styrene, from emissions units P003, P008, P009, P010, P011, and P012 are 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).

(2) 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 FEPTIO 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.

(3) 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.

(4) 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.

(5) The permittee shall retain a copy of all records on-site, including calculations and supporting information for at least 5 years.

e) Reporting Requirements

(1) 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.

(2) The permittee shall include 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.

(3) 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.

f) Testing Requirements

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

a. Emission Limitation:

1.59 pounds of VOC per hour for each emissions unit

Applicable Compliance Method:

This emission limitation was established as the potential to emit for this emissions unit by a one-time calculation at the worst case operating conditions as follows: multiply the maximum allowable resin VOC content (36.81 percent by weight) by the maximum design throughput rate (107.93 pounds of resin paste per hour) and by the worst case VOC emissions factor (0.04) as specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 4.4, Table 4.4-2 dated 2/07.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60 Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey

stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

b. Emission Limitation:

6.96 tons of VOC per year for each emissions unit

Applicable Compliance Method:

This emission limitation was established as the potential to emit for this emissions unit by a one-time calculation at the worst case operating conditions as follows: multiply the maximum hourly emission rate (1.59 pounds per hour) by the maximum annual hours of operation (8,760 hours) and divide by 2,000 pounds per ton.

g) Miscellaneous Requirements

(1) None.