

Facility ID: 1409030581 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Facility ID: 1409030581 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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) None.
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) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Filament Winding Equipment with Resin Bath - P001	OAC rule 3745-31-05(A)(3) (PTI14-05915)	Organic compound emissions shall not exceed 7.3 tons per year.  The requirements of this rule include compliance with OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05 (C).  See section B.1. See term and condition A.2.b.
	OAC rule 3745-31-05(C) Synthetic minor to avoid 40 CFR Part 63 Subpart WWWW and Title V permitting	For purposes of federal major stationary source applicability determinations, all annual organic compound emissions are considered volatile organic compound emissions.
	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	ORC 3704.03 (T)(4)	See term and condition A.2.c.

**2. Additional Terms and Conditions**

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations, except for volatile organic compound emissions as stated in term A.2.c.  
The total allowable emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application), P009 (Vacuum Assisted Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup), all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP, as a rolling, 365-day summation, and 24.9 TPY for any combination of HAPs, as a rolling, 365-day summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.  
The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to

the volatile organic compound (VOC) emissions from this air contaminant source because the calculated annual emission rate for VOC is less than ten tons per year, taking into account the federally enforceable rule emission limitation of 40 pounds per day of organic compounds under OAC rule 3745-21-07(G)(2).

**B. Operational Restrictions**

1. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

**C. Monitoring and/or Record Keeping Requirements**

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

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

- e. the total number of hours the emission unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings, i.e., (d)/(e), in pounds per hour.
2. The permittee shall summarize the emissions from the records maintained in section C.1 on a monthly basis and shall total the emissions at the end of the calendar year.
3. The permittee shall collect and record the following information for each day for the emissions units identified in term and condition A.2.b:

- a. the company identification for each coating (resin and gel coat) employed;
- b. the amount of each coating (resin and gel coat) employed, in pounds;
- c. the HAP content, recorded in percent weight, of each coating (resin and gel coat);
- d. the total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds per day [for each HAP the product of (b) times (c) times the Composite Fabricators Unified Emission Factors for Open Molding of Composites for each liquid organic material];
- e. the updated rolling, 365-day summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day;
- f. the total combined HAP emissions from all liquid organic materials employed, in pounds per day; and
- g. the updated rolling, 365-day summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

4. The permit to install for these emissions units P001, P002, P003, P006 thru P011 were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application and the supplemental information after submittal of the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene  
 TLV (ug/m3): 85.2  
 Maximum Hourly Emission Rate (lbs/hr): 44.44  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500  
 MAGLC (ug/m3): 2024

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that contain the following information:
  - a. An identification of each day during which the average hourly OC emissions from the coating materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
  - b. An identification of each day during which the OC emissions from the coating materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

The reports shall identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.
2. All deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.b. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
4. The permittee shall submit an annual report to the Hamilton County Department of Environmental Services which specifies the total organic compound emissions from this emissions unit. The report shall be submitted by January 31 of each year and cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:
 

Emission Limitations:  
8 lbs/hr and 40 lbs/day of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:  
Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in section C.1.

Emission Limitation:  
7.3 TPY of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:  
Compliance with the OC emission limitation shall be determined by the record keeping requirements specified in sections C.1 and C.2.
2. Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC contents of the materials employed in this emissions unit.
3. Compliance with the HAP emission limitations specified in term and condition A.2.b shall be determined by the required record keeping in term and condition C.3.

**F. Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.3, D and E.

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**Facility ID: 1409030581 Emissions Unit ID: P002 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

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) None.
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) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the

applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Spray Resin Layup on Dry Filament - P002	OAC rule 3745-31-05(A)(3) (PTI14-05915)	Organic compound emissions shall not exceed 7.3 tons per year.  The requirements of this rule include compliance with OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05 (C).  See section B.1. See term and condition A.2.b.
	OAC rule 3745-31-05(C) Synthetic minor to avoid 40 CFR Part 63 Subpart WWWW and Title V permitting	For purposes of federal major stationary source applicability determinations, all annual organic compound emissions are considered volatile organic compound emissions.
	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	ORC 3704.03 (T)(4)	See term and condition A.2.c.

2. **Additional Terms and Conditions**

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations, except for volatile organic compound emissions as stated in term A.2.c.  
The total allowable emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application), P009 (Vacuum Assisted Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup), all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP, as a rolling, 365-day summation, and 24.9 TPY for any combination of HAPs, as a rolling, 365-day summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source because the calculated annual emission rate for VOC is less than ten tons per year, taking into account the federally enforceable rule emission limitation of 40 pounds per day of organic compounds under OAC rule 3745-21-07(G)(2).

B. **Operational Restrictions**

- 1. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

C. **Monitoring and/or Record Keeping Requirements**

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

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

  - e. the total number of hours the emission unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings, i.e., (d)/(e), in pounds per hour.
- 2. The permittee shall summarize the emissions from the records maintained in section C.1 on a monthly basis and shall total the emissions at the end of the calendar year.
- 3. The permittee shall collect and record the following information for each day for the emissions units identified in term and condition A.2.b:
  - a. the company identification for each coating (resin and gel coat) employed;
  - b. the amount of each coating (resin and gel coat) employed, in pounds;
  - c. the HAP content, recorded in percent weight, of each coating (resin and gel coat);
  - d. the total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds per

day [for each HAP the product of (b) times (c) times the Composite Fabricators Unified Emission Factors for Open Molding of Composites for each liquid organic material];

e. the updated rolling, 365-day summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day;

f. the total combined HAP emissions from all liquid organic materials employed, in pounds per day; and

g. the updated rolling, 365-day summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

4. The permit to install for these emissions units P001, P002, P003, P006 thru P011 were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application and the supplemental information after submittal of the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene  
 TLV (ug/m3): 85.2  
 Maximum Hourly Emission Rate (lbs/hr): 44.44  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500  
 MAGLC (ug/m3): 2024

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

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

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

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

#### D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that contain the following information:
- An identification of each day during which the average hourly OC emissions from the coating materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
  - An identification of each day during which the OC emissions from the coating materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

The reports shall identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

- All deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.b. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
- The permittee shall submit an annual report to the Hamilton County Department of Environmental Services which specifies the total organic compound emissions from this emissions unit. This report shall be submitted by January 31 of each year and cover the previous calendar year.

#### E. Testing Requirements

1. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:

Emission Limitations:  
 8 lbs/hr and 40 lbs/day of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:  
 Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in section C.1.

Emission Limitation:  
7.3 TPY of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:  
Compliance with the OC emission limitation shall be determined by the record keeping requirements specified in sections C.1 and C.2.

2. Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC contents of the materials employed in this emissions unit.
3. Compliance with the HAP emission limitations specified in term and condition A.2.b shall be determined by the required record keeping in section C.3.

**F. Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.3, D and E.

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Facility ID: 1409030581 Emissions Unit ID: P003 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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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) None.
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) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Spray Resin Layup on Taped Filament Winding - P003	OAC rule 3745-31-05(A)(3) (PTI14-05915)	Organic compound emissions shall not exceed 7.3 tons per year.
		The requirements of this rule include compliance with OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05 (C).
		See section B.1.
	OAC rule 3745-31-05(C) Synthetic minor to avoid 40 CFR Part 63 Subpart WWWW and Title V permitting	See term and condition A.2.b.
	OAC rule 3745-21-07(G)(2)	For purposes of federal major stationary source applicability determinations, all annual organic compound emissions are considered volatile organic compound emissions.
	ORC 3704.03 (T)(4)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day. See term and condition A.2.c.

**2. Additional Terms and Conditions**

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations, except for volatile organic compound emissions as stated in term A.2.c.  
The total allowable emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application), P009 (Vacuum Assisted Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup), all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP, as a rolling, 365-day summation, and 24.9 TPY for any combination of HAPs, as a rolling, 365-day summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit

issuance.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source because the calculated annual emission rate for VOC is less than ten tons per year, taking into account the federally enforceable rule emission limitation of 40 pounds per day of organic compounds under OAC rule 3745-21-07(G)(2).

**B. Operational Restrictions**

1. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

**C. Monitoring and/or Record Keeping Requirements**

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

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

- e. the total number of hours the emission unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings, i.e., (d)/(e), in pounds per hour.
2. The permittee shall summarize the emissions from the records maintained in section C.1 on a monthly basis and shall total the emissions at the end of the calendar year.
3. The permittee shall collect and record the following information for each day for the emissions units identified in term and condition A.2.b:

- a. the company identification for each coating (resin and gel coat) employed;
- b. the amount of each coating (resin and gel coat) employed, in pounds;
- c. the HAP content, recorded in percent weight, of each coating (resin and gel coat);
- d. the total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds per day [for each HAP the product of (b) times (c) times the Composite Fabricators Unified Emission Factors for Open Molding of Composites for each liquid organic material];
- e. the updated rolling, 365-day summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day;
- f. the total combined HAP emissions from all liquid organic materials employed, in pounds per day; and
- g. the updated rolling, 365-day summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

4. The permit to install for these emissions units P001, P002, P003, P006 thru P011 were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application and the supplemental information after submittal of the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene  
 TLV (ug/m3): 85.2  
 Maximum Hourly Emission Rate (lbs/hr): 44.44  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500  
 MAGLC (ug/m3): 2024

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that contain the following information:
  - a. An identification of each day during which the average hourly OC emissions from the coating materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
  - b. An identification of each day during which the OC emissions from the coating materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

The reports shall identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.
2. All deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.b. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
4. The permittee shall submit an annual report to the Hamilton County Department of Environmental Services which specifies the total organic compound emissions from this emissions unit. This report shall be submitted by January 31 of each year and cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:
 

Emission Limitations:  
8 lbs/hr and 40 lbs/day of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:  
Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in section C.1.

Emission Limitation:  
7.3 TPY of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:  
Compliance with the OC emission limitation shall be determined by the record keeping requirements specified in sections C.1 and C.2.
2. Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC contents of the materials employed in this emissions unit.
3. Compliance with the HAP emission limitations specified in term and condition A.2.b shall be determined by the required record keeping in term and condition C.3.

**F. Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.3, D and E.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

**Facility ID: 1409030581 Emissions Unit ID: P006 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

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) None.
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) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Gelcoat Application - P006	OAC rule 3745-31-05(A)(3) (PTI14-05915)	Organic compound emissions shall not exceed 7.3 tons per year.  The requirements of this rule include compliance with OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05 (C).  See section B.1.
	OAC rule 3745-31-05(C) Synthetic minor to avoid 40 CFR Part 63 Subpart WWWW and Title V permitting	See term and condition A.2.b.  For purposes of federal major stationary source applicability determinations, all annual organic compound emissions are considered volatile organic compound emissions.
	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	ORC 3704.03 (T)(4)	See term and condition A.2.c.

2. **Additional Terms and Conditions**

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations, except for volatile organic compound emissions as stated in term A.2.c.  
The total allowable emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application), P009 (Vacuum Assisted Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup), all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP, as a rolling, 365-day summation, and 24.9 TPY for any combination of HAPs, as a rolling, 365-day summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source because the calculated annual emission rate for VOC is less than ten tons per year, taking into account the federally enforceable rule emission limitation of 40 pounds per day of organic compounds under OAC rule 3745-21-07(G)(2).

B. **Operational Restrictions**

1. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

C. **Monitoring and/or Record Keeping Requirements**

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

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

  - e. the total number of hours the emission unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings, i.e., (d)/(e), in pounds per hour.
2. The permittee shall summarize the emissions from the records maintained in section C.1 on a monthly basis and shall total the emissions at the end of the calendar year.
3. The permittee shall collect and record the following information for each day for the emissions units identified in term and condition A.2.b:
  - a. the company identification for each coating (resin and gel coat) employed;
  - b. the amount of each coating (resin and gel coat) employed, in pounds;
  - c. the HAP content, recorded in percent weight, of each coating (resin and gel coat);

- d. the total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds per day [for each HAP the product of (b) times (c) times the Composite Fabricators Unified Emission Factors for Open Molding of Composites for each liquid organic material];
- e. the updated rolling, 365-day summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day;
- f. the total combined HAP emissions from all liquid organic materials employed, in pounds per day; and
- g. the updated rolling, 365-day summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

- 4. The permit to install for these emissions units P001, P002, P003, P006 thru P011 were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application and the supplemental information after submittal of the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene  
 TLV (ug/m3): 85.2  
 Maximum Hourly Emission Rate (lbs/hr): 44.44  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500  
 MAGLC (ug/m3): 2024

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

#### D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that contain the following information:
  - a. An identification of each day during which the average hourly OC emissions from the coating materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
  - b. An identification of each day during which the OC emissions from the coating materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

The reports shall identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.
- 2. All deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.b. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
- 4. The permittee shall submit an annual report to the Hamilton County Department of Environmental Services which specifies the total organic compound emissions from this emissions unit. This report shall be submitted by January 31 of each year and cover the previous calendar year.

#### E. Testing Requirements

- 1. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:
 

Emission Limitations:  
 8 lbs/hr and 40 lbs/day of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:  
 Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in section C.1.

Emission Limitation:  
7.3 TPY of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:  
Compliance with the OC emission limitation shall be determined by the record keeping requirements specified in sections C.1 and C.2.

2. Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC contents of the materials employed in this emissions unit.
3. Compliance with the HAP emission limitations specified in term and condition A.2.b shall be determined by the required record keeping in section C.3.

**F. Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.3, D and E.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

**Facility ID: 1409030581 Emissions Unit ID: P007 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

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) None.
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) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Vacuum Assisted Resin Transfer Molding 1 - P007	OAC rule 3745-31-05(A)(3) (PTI14-05915)	Organic compound emissions shall not exceed 7.3 tons per year.  The requirements of this rule include compliance with OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05 (C).  See section B.1. See term and condition A.2.b.
	OAC rule 3745-31-05(C) Synthetic minor to avoid 40 CFR Part 63 Subpart WWWW and Title V permitting	For purposes of federal major stationary source applicability determinations, all annual organic compound emissions are considered volatile organic compound emissions.
	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	ORC 3704.03 (T)(4)	See term and condition A.2.c.

**2. Additional Terms and Conditions**

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations, except for volatile organic compound emissions as stated in term A.2.c. The total allowable emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application), P009 (Vacuum Assisted Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup), all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP, as a rolling, 365-day summation, and 24.9 TPY for any combination of HAPs, as a rolling, 365-day summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source because the calculated annual emission rate for VOC is less than ten tons per year, taking into account the federally enforceable rule emission limitation of 40 pounds per day of organic compounds under OAC rule 3745-21-07(G)(2).

**B. Operational Restrictions**

1. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

**C. Monitoring and/or Record Keeping Requirements**

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

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

- e. the total number of hours the emission unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings, i.e., (d)/(e), in pounds per hour.
2. The permittee shall summarize the emissions from the records maintained in section C.1 on a monthly basis and shall total the emissions at the end of the calendar year.
3. The permittee shall collect and record the following information for each day for the emissions units identified in term and condition A.2.b:
  - a. the company identification for each coating (resin and gel coat) employed;
  - b. the amount of each coating (resin and gel coat) employed, in pounds;
  - c. the HAP content, recorded in percent weight, of each coating (resin and gel coat);
  - d. the total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds per day [for each HAP the product of (b) times (c) times the Composite Fabricators Unified Emission Factors for Open Molding of Composites for each liquid organic material];
  - e. the updated rolling, 365-day summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day;
  - f. the total combined HAP emissions from all liquid organic materials employed, in pounds per day; and
  - g. the updated rolling, 365-day summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

4. The permit to install for these emissions units P001, P002, P003, P006 thru P011 were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application and the supplemental information after submittal of the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene  
 TLV (ug/m3): 85.2  
 Maximum Hourly Emission Rate (lbs/hr): 44.44  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500  
 MAGLC (ug/m3): 2024

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

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

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

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that contain the following information:
  - a. An identification of each day during which the average hourly OC emissions from the coating materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
  - b. An identification of each day during which the OC emissions from the coating materials exceeded 40 pounds per day, and the actual OC emissions for each such day.The reports shall identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.
2. All deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.b. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
4. The permittee shall submit an annual report to the Hamilton County Department of Environmental Services which specifies the total organic compound emissions from this emissions unit. This report shall be submitted by January 31 of each year and cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:

Emission Limitations:  
8 lbs/hr and 40 lbs/day of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:  
Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in section C.1.

Emission Limitation:  
7.3 TPY of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:  
Compliance with the OC emission limitation shall be determined by the record keeping requirements specified in sections C.1 and C.2.
2. Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC contents of the materials employed in this emissions unit.
3. Compliance with the HAP emission limitations specified in term and condition A.2.b shall be determined by the required record keeping in section C.3.

**F. Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.3, D and E.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

**Facility ID: 1409030581 Emissions Unit ID: P008 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

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) None.
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) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Assembly and Manual Resin Application - P008	OAC rule 3745-31-05(A)(3) (PT114-05915)	Organic compound emissions shall not exceed 7.3 tons per year.  The requirements of this rule include compliance with OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05 (C).  See section B.1. See term and condition A.2.b.
	OAC rule 3745-31-05(C) Synthetic minor to avoid 40 CFR Part 63 Subpart WWWW and Title V permitting	For purposes of federal major stationary source applicability determinations, all annual organic compound emissions are considered volatile organic compound emissions.
	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	ORC 3704.03 (T)(4)	See term and condition A.2.c.

**2. Additional Terms and Conditions**

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations, except for volatile organic compound emissions as stated in term A.2.c.  
The total allowable emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application), P009 (Vacuum Assisted Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup), all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP, as a rolling, 365-day summation, and 24.9 TPY for any combination of HAPs, as a rolling, 365-day summation.  
  
The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.  
The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source because the calculated annual emission rate for VOC is less than ten tons per year, taking into account the federally enforceable rule emission limitation of 40 pounds per day of organic compounds under OAC rule 3745-21-07(G)(2).

**B. Operational Restrictions**

1. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

**C. Monitoring and/or Record Keeping Requirements**

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

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

  - e. the total number of hours the emission unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings, i.e., (d)/(e), in pounds per hour.
2. The permittee shall summarize the emissions from the records maintained in section C.1 on a monthly basis and shall total the emissions at the end of the calendar year.
3. The permittee shall collect and record the following information for each day for the emissions units identified in term and condition A.2.b:
  - a. the company identification for each coating (resin and gel coat) employed;
  - b. the amount of each coating (resin and gel coat) employed, in pounds;

- c. the HAP content, recorded in percent weight, of each coating (resin and gel coat);
  - d. the total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds per day [for each HAP the product of (b) times (c) times the Composite Fabricators Unified Emission Factors for Open Molding of Composites for each liquid organic material];
  - e. the updated rolling, 365-day summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day;
  - f. the total combined HAP emissions from all liquid organic materials employed, in pounds per day; and
  - g. the updated rolling, 365-day summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

- 4. The permit to install for these emissions units P001, P002, P003, P006 thru P011 were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application and the supplemental information after submittal of the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene  
 TLV (ug/m3): 85.2  
 Maximum Hourly Emission Rate (lbs/hr): 44.44  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500  
 MAGLC (ug/m3): 2024

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

#### D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that contain the following information:
  - a. An identification of each day during which the average hourly OC emissions from the coating materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
  - b. An identification of each day during which the OC emissions from the coating materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

The reports shall identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.
- 2. All deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.b. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
- 4. The permittee shall submit an annual report to the Hamilton County Department of Environmental Services which specifies the total organic compound emissions from this emissions unit. This report shall be submitted by January 31 of each year and cover the previous calendar year.

#### E. Testing Requirements

- 1. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:

Emission Limitations:  
 8 lbs/hr and 40 lbs/day of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in section C.1.

Emission Limitation:  
7.3 TPY of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:  
Compliance with the OC emission limitation shall be determined by the record keeping requirements specified in sections C.1 and C.2.

2. Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC contents of the materials employed in this emissions unit.
3. Compliance with the HAP emission limitations specified in term and condition A.2.b shall be determined by the required record keeping in section C.3.

**F. Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.3, D and E.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1409030581 Emissions Unit ID: P009 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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) None.
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) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Vacuum Assisted Resin Transfer Molding 2 - P009	OAC rule 3745-31-05(A)(3) (PTI14-05915)	Organic compound emissions shall not exceed 7.3 tons per year.  The requirements of this rule include compliance with OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05 (C).  See section B.1. See term and condition A.2.b.
	OAC rule 3745-31-05(C) Synthetic minor to avoid 40 CFR Part 63 Subpart WWWW and Title V permitting	For purposes of federal major stationary source applicability determinations, all annual organic compound emissions are considered volatile organic compound emissions.
	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	ORC 3704.03 (T)(4)	See term and condition A.2.c.

**2. Additional Terms and Conditions**

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations, except for volatile organic compound emissions as stated in term A.2.c. The total allowable emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application), P009 (Vacuum Assisted Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup), all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP, as a rolling, 365-day summation, and 24.9 TPY for any

combination of HAPs, as a rolling, 365-day summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source because the calculated annual emission rate for VOC is less than ten tons per year, taking into account the federally enforceable rule emission limitation of 40 pounds per day of organic compounds under OAC rule 3745-21-07(G)(2).

**B. Operational Restrictions**

1. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

**C. Monitoring and/or Record Keeping Requirements**

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

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

- e. the total number of hours the emission unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings, i.e., (d)/(e), in pounds per hour.
2. The permittee shall summarize the emissions from the records maintained in section C.1 on a monthly basis and shall total the emissions at the end of the calendar year.
3. The permittee shall collect and record the following information for each day for the emissions units identified in term and condition A.2.b:
  - a. the company identification for each coating (resin and gel coat) employed;
  - b. the amount of each coating (resin and gel coat) employed, in pounds;
  - c. the HAP content, recorded in percent weight, of each coating (resin and gel coat);
  - d. the total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds per day [for each HAP the product of (b) times (c) times the Composite Fabricators Unified Emission Factors for Open Molding of Composites for each liquid organic material];
  - e. the updated rolling, 365-day summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day;
  - f. the total combined HAP emissions from all liquid organic materials employed, in pounds per day; and
  - g. the updated rolling, 365-day summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

4. The permit to install for these emissions units P001, P002, P003, P006 thru P011 were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application and the supplemental information after submittal of the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene  
 TLV (ug/m3): 85.2  
 Maximum Hourly Emission Rate (lbs/hr): 44.44  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500  
 MAGLC (ug/m3): 2024

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial

Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

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

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

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that contain the following information:
  - a. An identification of each day during which the average hourly OC emissions from the coating materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
  - b. An identification of each day during which the OC emissions from the coating materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

The reports shall identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.
2. All deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.b. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
4. The permittee shall submit an annual report to the Hamilton County Department of Environmental Services which specifies the total organic compound emissions from this emissions unit. This report shall be submitted by January 31 of each year and cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:
 

Emission Limitations:  
8 lbs/hr and 40 lbs/day of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:  
Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in term and condition C.1.

Emission Limitation:  
7.3 TPY of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:  
Compliance with the OC emission limitation shall be determined by the record keeping requirements specified in terms and conditions C.1 and C.2.
2. Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC contents of the materials employed in this emissions unit.
3. Compliance with the HAP emission limitations specified in term and condition A.2.b shall be determined by the required record keeping in term and condition C.3.

**F. Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.3, D and E.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1409030581 Emissions Unit ID: P010 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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) None.
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) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Cowles Resin Mixer - P010	OAC rule 3745-31-05(A)(3) (PTI14-05915)	Organic compound emissions shall not exceed 132.5 pounds per day and 24.18 tons per year.
	OAC rule 3745-17-07(A)(1)	The requirements of this rule include compliance with OAC rule 3745-31-05(C). Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 4.10 pounds per hour.
	OAC rule 3745-31-05(C)	See term and condition A.2.b.
	ORC 3704.03 (T)(4)	For purposes of federal major stationary source applicability determinations, all annual organic compound emissions are considered volatile organic compound emissions. See term and condition A.2.c.

**2. Additional Terms and Conditions**

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations listed in section A.1.  
The total allowable emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application), P009 (Vacuum Assisted Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup) all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP, as a rolling, 365-day summation, and 24.9 TPY for any combination of HAPs, as a rolling, 365-day summation.  
  
The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.  
The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate matter (PM) and particulate matter less than 10 micron in diameter (PM10) emissions from this air contaminant source because the calculated annual emission rate for PM and PM10 is less than ten tons per year.

**B. Operational Restrictions**

1. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. the company identification for each resin mixed;
  - b. the amount of each resin mixed, in pounds;
  - c. the organic compound content, recorded in percent weight, of each resin; and
  - d. the total organic compound emission rate from all resin, in pounds per day [the summation of (b x c) x (emission factor of 0.005 lb emitted per lb of OC mixed) for all resins mixed during the day].

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. ]
2. The permittee shall summarize the emissions from the records maintained in section C.1 on a monthly basis and shall total the emissions at the end of the calendar year.
3. The permittee shall collect and record the following information for each day for the emissions units identified in term and condition A.2.b:
  - a. the company identification for each resin mixed;
  - b. the amount of each resin mixed, in pounds;
  - c. the HAP content, recorded in percent weight, of each resin;
  - d. the total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds per day [for each HAP the summation of (b x c) x (emission factor of 0.005 lb emitted per lb of HAP mixed) for all resins mixed during the day];

e. the updated rolling, 365-day summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day;

f. the total combined HAP emissions from all liquid organic materials employed, in pounds per day; and

g. the updated rolling, 365-day summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days. For the first 365 days of operation following issuance of this permit, this shall be a cumulative total for each day.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

4. The permit to install for these emissions units P001, P002, P003, P006 thru P011 were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application and supplemental information after submittal of the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene  
 TLV (ug/m3): 85.2  
 Maximum Hourly Emission Rate (lbs/hr): 44.44  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500  
 MAGLC (ug/m3): 2024

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

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

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

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

#### D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that contain the following information:
  - a. An identification of each day during which the OC emissions from this emissions unit exceeded 132.5 pounds per day, and the actual OC emissions for each such day.

The reports shall identify all exceedances of this limitation, as well as the corrective actions that were taken to achieve compliance.
2. All deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.b. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
4. The permittee shall submit an annual report to the Hamilton County Department of Environmental Services which specifies the total organic compound emissions from this emissions unit. This report shall be submitted by January 31 of each year and cover the previous calendar year.

#### E. Testing Requirements

1. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:
 

Emission Limitation:  
132.5 lbs/day of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:  
Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in section C.1.

Emission Limitation:  
24.18 TPY of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:  
Compliance with the OC emission limitations shall be determined by the record keeping requirements specified

in sections C.1 and C.2.

2. Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC contents of the materials employed in this emissions unit.
3. Compliance with the HAP emission limitations specified in term and condition A.2.b shall be determined by the required record keeping in section C.3.

**F. Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.3, D and E.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1409030581 Emissions Unit ID: P011 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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) None.
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) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Plant-wide Cleanup Materials - P011	OAC rule 3745-31-05(A)(3) (PTI14-05915)	Organic compound emissions shall not exceed 3900 pounds per month and 23.36 tons per year.

**2. Additional Terms and Conditions**

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the mass emission limitations listed in section A.1.

**B. Operational Restrictions**

1. The permittee shall not employ any hazardous air pollutants or volatile organic compounds in this emissions unit.
2. The permittee shall employ no photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5) in this emissions unit.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each month for plant wide cleanup:
  - a. the company identification for each cleanup material employed;
  - b. the amount of each cleanup material employed, in pounds; and
  - c. the total organic compound emission rate from all cleanup materials.

These records shall be summarized at the end of each calendar year.

2. The permit to install for these emissions units P001, P002, P003, P006 thru P011 were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application and supplemental information after submittal of the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Acetone  
 TLV (ug/m3): 1188  
 Maximum Hourly Emission Rate (lbs/hr): 44.44  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500  
 MAGLC (ug/m3): 28285

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

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

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

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

**D. Reporting Requirements**

1. The permittee shall submit an annual report to the Hamilton County Department of Environmental Services which specifies the total organic compound emissions from this emissions unit. This report shall be submitted by January 31 of each year and cover the previous calendar year.
2. The permittee shall notify the Hamilton County Department of Environmental Services of the use of any photochemically reactive materials, any HAP materials or any volatile organic compound materials in this emissions unit. If no deviations occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

**E. Testing Requirements**

1. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:  
  
Emission Limitations:  
3900 lbs/month of OC emissions and 23.36 tpy from cleanup materials in this emissions unit.  
  
Applicable Compliance Method:  
Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in section C.1.
2. Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC contents of the materials employed in this emissions unit.

**F. Miscellaneous Requirements**

1. None