



State of Ohio Environmental Protection Agency

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P.O. Box 1049  
Columbus, OH 43216-1049

11/14/2008

Certified Mail

Mr. Louis Aube  
PICKEN'S PLASTICS, INC. - JEFFERSON PLANT 3  
149 South Cucumber Street  
Jefferson, OH 44047

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0204000423  
Permit Number: P0103932  
Permit Type: Initial Installation  
County: Ashtabula

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR
No	CEMS
Yes	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Star Beacon. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
122 South Front Street  
Columbus, Ohio 43215

and Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 43087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA  
Ohio EPA-NEDO; Pennsylvania; Canada

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director





**Permit Strategy Write-Up**

- 1. Check all that apply:  
 Synthetic Minor Determination  
 Netting Determination
- 2. Facility Description: Pickens Plastics, Inc. – Jefferson Plant is a reinforced plastic composite parts manufacturer and is subject to the National Emissions Standards for HAPs, 40 CFR, Part 63, Subpart WWWW. There are also plastic part coating operations that are subject to the NESHAP, 40 CFR, Part 63, Subpart PPPP.
- 3. Facility Emissions and Attainment Status: Pickens Plastics, Inc. – Jefferson Plant is a Title V major source that is major for volatile organic compound (VOC) emissions and for single Hazardous Air Pollutant (HAP) emissions as styrene. The facility has the potential to emit 223 TPY VOCs, according to the allowable emissions rates in the current Title V operating permit issued on 1/01/08. It is an existing major source that emits <100 TPY of HAPs.

Ashtabula County is in moderate non-attainment status with the federal ozone standard. The facility is located in the City of Jefferson, which is in attainment status for PM<sub>2.5</sub>, particulate matter which has a maximum diameter of 2.5 micrometers. The entire State of Ohio is attainment for sulfur dioxide (SO<sub>2</sub>), nitrogen dioxide (NO<sub>x</sub>), carbon monoxide (CO) and lead (Pb).

- 4. Source (Project) Emissions: Nine work stations (R019 - R027) will be installed to manufacture fiberglass reinforced composite plastic parts. Unrestricted project potential emissions may be 51.69 tons/yr of VOC emissions, which is above the 40 tons/yr significant net emissions increase as defined in OAC rule 3745-31-01(MMMMM). The applicant proposes to take restriction(s) to limit potential VOC emissions to 34.36 TPY VOC emissions, as a rolling 12-month period from the R019-R027 group. This synthetic minor permit will also have materials usage limits, over a rolling 12-month period for a practically, federally enforceable limit as follows:

<b>Proposed Restrictions and Restricted VOC Emissions</b>			
OEPA No(s).	EU Identification	Material usage restriction, as a rolling 12-month summation	Restricted VOC Emissions, TPY <sup>A</sup>
R019 - R023	Gelcoat operations group	249,176 lbs gelcoat	14.74
R024 – R026	Resin operations group	850, 973 lbs resin	18.03
R027	Flexible adhesive booth	58,564 lbs flexible adhesive	01.59
R019 - R027	All EUs in project	NA	34.36

Note A – From Project Emissions Table, PICJ\_R019\_R027\_Emissions.xls

- 5. Conclusion: Restricted VOC emissions of 34.36 TPY VOCs is minor source addition, below the major source level of 40 TPY, to a major VOC facility. The project will not be subject to the Lowest Achievable Emission Rate (LAER) and Emissions Offset requirements within OAC rules 3745-31-21 through 3745-31-27 for ozone non-attainment areas.
- 6. Please provide additional notes or comments as necessary: None.

7. Permit Allowable Emissions at Each EU

Permit Allowable OC Emissions		
OEPA EU No.	Emissions Unit Identification	Allowable OC Emissions, TPY <sup>B</sup>
19	elcoat spray booth (stage 1)	5.92
20	elcoat spray booth (stage 2)	5.92
21	elcoat spray booth (stage 3)	5.92
22	elcoat spray booth (stage 4)	5.92
23	elcoat spray booth (stage 5)	3.77
24	sin spray booth (stage 6)	7.31
25	sin spray booth (stage 7)	7.31
26	sin spray booth (stage 8)	7.31
27	lexible adhesive spray booth (stage 9)	2.32
19 – R027	pray booths (stages 1 – 9)	51.69

Note B – See Project Emissions Table, PICJ\_R019\_R027\_Emissions.xls

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	34.36

PUBLIC NOTICE  
Issuance Of Draft Air Pollution Permit-To-Install  
PICKEN'S PLASTICS, INC. - JEFFERSON PLANT 3

Issue Date: 11/14/2008  
Permit Number: P0103932  
Permit Type: Initial Installation  
Permit Description: Installation of nine stations to make fiberglass reinforced plastic composite parts  
Facility ID: 0204000423  
Facility Location: PICKEN'S PLASTICS, INC. - JEFFERSON PLANT 3  
149 S. Cucumber St., P.O. Box 127  
Jefferson, OH 44047  
Facility Description: All Other Plastics Product Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Bridget Byrne at Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road or (330)425-9171. The permit can be downloaded from the Web page: [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc)





**State of Ohio Environmental Protection Agency  
Division of Air Pollution Control**

**DRAFT**

**Air Pollution Permit-to-Install  
for  
PICKEN'S PLASTICS, INC. - JEFFERSON PLANT 3**

Facility ID: 0204000423  
Permit Number: P0103932  
Permit Type: Initial Installation  
Issued: 11/14/2008  
Effective: To be entered upon final issuance





State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Air Pollution Permit-to-Install**  
 for  
 PICKEN'S PLASTICS, INC. - JEFFERSON PLANT 3

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0103932

**Facility ID:** 0204000423

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

# Authorization

Facility ID: 0204000423  
Facility Description: Plastics Manufacturer  
Application Number(s): A0036067  
Permit Number: P0103932  
Permit Description: Installation of nine stations to make fiberglass reinforced plastic composite parts  
Permit Type: Initial Installation  
Permit Fee: \$1,800.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 11/14/2008  
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

PICKEN'S PLASTICS, INC. - JEFFERSON PLANT 3  
149 S. Cucumber St.  
P.O. Box 127  
Jefferson, OH 44047

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 43087  
(330)425-9171

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



## Authorization (continued)

Permit Number: P0103932

Permit Description: Installation of nine stations to make fiberglass reinforced plastic composite parts

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

**Emissions Unit ID:** R027  
 Company Equipment ID: Adhesive - stage 9  
 Superseded Permit Number:  
 General Permit Category and Type: Not Applicable

**Group Name: Gelcoat operations**

<b>Emissions Unit ID:</b>	<b>R019</b>
Company Equipment ID:	stage 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>R020</b>
Company Equipment ID:	Gelcoat - stage 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>R021</b>
Company Equipment ID:	Gelcoat - stage 3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>R022</b>
Company Equipment ID:	Gelcoat - stage 4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>R023</b>
Company Equipment ID:	Gelcoat - stage 5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	

**Group Name: Resin operations**

<b>Emissions Unit ID:</b>	<b>R024</b>
Company Equipment ID:	Resin - stage 6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>R025</b>
Company Equipment ID:	resin - stage 7
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>R026</b>
Company Equipment ID:	Resin - stage 8



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**  
**Permit Number:** P0103932  
**Facility ID:** 0204000423

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

Superseded Permit Number: ----- General Permit Category and Not Applicable Type:
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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0103932

**Facility ID:** 0204000423

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

## **A. Standard Terms and Conditions**



## **1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A. 2.a), Severability Clause
  - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A. 9., Reporting Requirements
  - (5) Standard Term and Condition A. 10., Applicability
  - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A. 14., Public Disclosure
  - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A. 16., Fees
  - (10) Standard Term and Condition A. 17., Permit Transfers

## **2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## **3. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



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

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.



(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 5. **Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## 6. **Compliance Requirements**

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:



- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted



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

**10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum,



the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

## **13. Construction Compliance Certification**

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## **14. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

## **15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

## **16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0103932

**Facility ID:** 0204000423

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

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

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northeast District Office must be notified in writing of any transfer of this permit.

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



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## **B. Facility-Wide Terms and Conditions**



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
2. Permit to Install #P0103932 for these air contaminant sources takes into account the following voluntary restrictions, regarding the emissions units specified in B.3, as proposed by the permittee for the purpose of avoiding the Lowest Achievable Emissions Rate (LAER) and Emissions Offset requirements pursuant to OAC rules 3745-31-21 through 3745-31-27: the emissions of volatile organic compounds (VOC) shall not exceed 34.36 tons/year, based on a rolling, 12-month summation of the monthly emissions, and shall be achieved by employing the operational restrictions, specified in C.1.c)(1), C.2.c)(1), and C.3.c)(1).

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table for the emissions unit(s) specified in 3.:

Month(s)	Maximum Allowable Cumulative Emissions of VOCs, Tons/Year
1	2.86
1 - 2	5.73
1 - 3	8.59
1 - 4	11.45
1 - 5	14.32
1 - 6	17.18
1 - 7	20.04
1 - 8	22.91
1 - 9	25.77
1 - 10	28.63
1 - 11	31.50
1 - 12	34.36

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

3. Voluntary material usage restrictions to limit potential emissions of VOC, cover the following emissions units:
  - a) R019 - Gelcoat spray booth (stage 1), mechanical application;
  - b) R020 - Gelcoat spray booth (stage 2), mechanical application;
  - c) R021 - Gelcoat spray booth (stage 3), manual application;
  - d) R022 - Gelcoat spray booth (stage 4), manual application;
  - e) R023 – Barrier gelcoat spray booth (stage 5), mechanical application;
  - f) R024 - Resin spray booth (stage 6), mechanical application, fiberglass chop & layup;



- g) R025 - Resin spray booth (stage 7), mechanical application, fiberglass chop & layup;
- h) R026 - Resin spray booth (stage 8), mechanical application, fiberglass chop & layup; and
- i) R027 - Flexible adhesive spray booth (stage 9), manual application.

4. **Monitoring and/or Recordkeeping Requirements:** The permittee shall maintain monthly records of the following information for the emissions unit(s) specified in B.3:

- a) the VOC emissions for each month; and
- b) beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC emissions.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative VOC emissions for each calendar month.

5. **Reporting Requirements:** The permittee shall submit quarterly deviation (excursion) reports that include the following information:

- a) each month during which exceedances of the rolling, 12-month emission limitation of VOC from the emissions units specified in B.3 exceeded 34.36 tons VOC/yr; and
- b) for each deviation, the actual rolling, 12-month emissions of VOC, in tons.

And, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall report all exceedances of the maximum allowable cumulative VOC emissions. These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

6. Compliance with the allowable emission limitation in B.2 of these terms and conditions shall be determined in accordance with the following method:

Emission Limitation:

The emissions of VOC shall not exceed 34.36 tons/year, based on a rolling, 12-month summation of the monthly emissions from the emissions units specified in B.3.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in B.4.

7. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart WWWW: R019 through P027. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northeast District Office.

8. All of the emissions units specified in B.7 are subject to 40 CFR 63.5805(a), which states that existing facilities that emit less than 100 tons/year of HAPs are subject to the organic HAP emissions limits in Table 3 and the work practice standards in Table 4 to 40 CFR Part 63, Subpart WWWW.



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9. The permittee previously submitted an Initial Notification for 40 CFR Part 63, Subpart WWWW. If there is a change in any information submitted in the Initial Notification, the permittee must submit the changes [i.e. startup of new affected emissions unit(s)] in writing to the Administrator within 15 calendar days after that date.



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## **C. Emissions Unit Terms and Conditions**



**1. R027, Adhesive - stage 9**

**Operations, Property and/or Equipment Description:**

Flexible adhesive spray booth (stage 9), manual application for fiberglass reinforced plastic composites production

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(3).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(b)	See b)(2)a.
b.	OAC rule 3745-21-07(G)(2)	See b)(2)b. The daily emission limitation required by this applicable rule is less stringent than the daily emission limitation established pursuant to OAC rule 3745-31-05(E).
c.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	See B.7, B.8, b)(2)c and c)(2).
d.	40 CFR Part 63, Subpart A (40 CFR 63.1-15) (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1-15 apply. See B.9.
e.	OAC rule 3745-31-05(E) – voluntary restriction to avoid BAT	The organic compound (OC) emissions shall not exceed 12.69 lbs/day and 2.32 tons/year.
f.	OAC rule 3745-31-05(D)(1)(a) – voluntary restriction to avoid major non-attainment new source review	See c)(1), d)(1), e)(1) and B.2 through B.6.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compound (OC) emissions from this air contaminant source since the uncontrolled potential to emit for OC is less than 10 tons/yr.



- b. Each day that a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), is employed, the OC emissions from all materials shall not exceed 8 lbs/hr and 40 lbs/day. The OC emission limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive coatings or clean up materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio State Implementation Plan (SIP) for OCs. After the rule is added to the Ohio SIP, the emission limitations in b)(1)b, and the monitoring, record keeping, reporting and testing requirements related to the hourly limitation, included in d)(1)g, d)(1)l, e)(1)a, e)(1)b, f)(1)a and f)(1)b shall be void.
- c. The permittee shall comply with the organic hazardous air pollutant (HAP) emissions limitations, in pounds of HAP emissions per ton of material usage as a rolling, 12-month average, in accordance with Table 3 in 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935).

c) Operational Restrictions

- (1) The maximum annual flexible adhesive material(s) usage for this emissions unit shall not exceed 58,564 pounds based upon a rolling, 12-month summation of the material usage rates.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the material usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Material(s) Usage
1	4,880
1 - 2	9,761
1 - 3	14,641
1 - 4	19,521
1 - 5	24,402
1 - 6	29,282
1 - 7	34,162
1 - 8	39,043
1 - 9	43,923
1 - 10	48,803
1 - 11	53,684
1 - 12	58,564

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual material(s) usage limitation shall be based upon a rolling, 12-month summation of the material(s) usage figures.

- (2) The permittee shall comply with any applicable Work Practice Standards in accordance with Table 4 in 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935).



d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information:

- a. the name and identification of each material employed;
- b. the OC content, the VOC content and the HAP content, in percent by weight, of each material employed;
- c. the weight of each material employed, in lbs;
- d. the weight of any OC thinning materials added to the base materials, in lbs;
- e. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the material(s) usage figures;

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative material(s) usage for each calendar month;

- f. the total number of days the emissions unit was in operation;
- g. the total number of hours the emissions unit was in operation;
- h. a determination of the OC, VOC and HAP emission factors for each non-resin and each non-gelcoat material using formulation data, supplied by the manufacturer of the materials, or from data determined by an analysis of each material, as applied, by Reference Method 24 or Method 24A (alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA);
- i. the OC, VOC and HAP emissions for each material, in lbs/month, calculated using the emission factor(s) specified in d)(1)h;
- j. the total monthly OC, VOC and HAP emissions, calculated as the sum of the emissions calculated in d)(1)i plus the OC thinning materials emissions, as specified in d)(1)d;
- k. the average OC, VOC and HAP emissions, in lbs/day, for all materials employed (calculated as d)(1)j/d)(1)f); and
- l. the average OC, VOC and HAP emissions, in lbs/hr, for all materials employed (calculated as d)(1)j/d)(1)g).

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, d)(1)g and d)(1)l will be voided entirely.]

(2) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935).

(3) Modeling to demonstrate compliance with, the AToxic Air Contaminant Statute<sup>o</sup>, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit=s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be



less than 1.0 ton per year or is subject to a MACT rule in 40 CFR Part 63. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. each month during which the average hourly OC emission rate exceeded 8 lbs/hr, and the actual average hourly OC emission rate;
  - b. each month during which the average daily OC emission rate exceeded 40 lbs/day, and the actual OC emission rate;
  - c. each month during which the average daily OC emission rate exceeded 12.69 lbs/day, and the actual OC emission rate;
  - d. all exceedances of the rolling, 12-month limitation on material(s) usage; and
  - e. for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative material(s) usage levels.

These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit. If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, e)(1)a and e)(1)b shall be voided.]

- (2) The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year and shall include the actual tons of OC emitted and the allowable emissions limit, in tons/year of OC.
- (3) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935).

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The OC emissions shall not exceed 8 lbs/hr for each day that photochemically reactive materials are employed.



Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1)l.

b. Emission Limitation:

The OC emissions shall not exceed 40 lbs/day for each day that photochemically reactive materials are employed.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1)k.

c. Emission Limitation:

The OC emissions shall not exceed 12.69 lbs/day for each day that any materials are employed.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1)k.

d. Emission Limitation:

The OC emissions shall not exceed 2.32 tons/year.

Applicable Compliance Method:

Compliance shall be demonstrated by the summation of the monthly OC emissions, based upon the record keeping requirements specified in d)(1)j, divided by 2000 pounds/ton.

e. Emission Limitation:

The organic HAP emissions, in pounds of HAP emissions per ton of material usage as a rolling, 12-month average, shall not exceed the requirements in Table 3 in 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935).

Applicable Compliance Method:

Compliance may be demonstrated by the calculation of an organic HAP emission factor based upon the record keeping requirements specified in d)(1)h.

(2) Organic HAP content analysis may be performed in accordance with 40 CFR 63.5797. Alternate organic HAP content determination(s) may be made in accordance with 40 CFR 63.5798.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, f)(1)a and f)(1)b shall be voided.]



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g) Miscellaneous Requirements

- (1) All OCs employed in the production processes at this emissions unit are photochemically reactive VOCs and HAPs.
- (2) OC emissions from cleanup of equipment associated with this emissions unit shall be attributed to emissions unit P902 - acetone rag wiping.



**2. Emissions Unit Group - Gelcoat operations: R019, R020, R021, R022, R023,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
R019	Gelcoat spray booth (stage 1), mechanical application for fiberglass reinforced plastic composites production
R020	Gelcoat spray booth (stage 2), mechanical application for fiberglass reinforced plastic composites production
R021	Gelcoat spray booth (stage 3), manual application for fiberglass reinforced plastic composites production
R022	Gelcoat spray (stage 4) booth, manual application for fiberglass reinforced plastic composites production
R023	Barrier gelcoat spray booth (stage 5), mechanical application for fiberglass reinforced plastic composites production

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(a) d)(3).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(b)	See b)(2)a.
b.	OAC rule 3745-21-07(G)(2)	See b)(2)b. The daily emission limitation required by this applicable rule is less stringent than the daily emission limitation established pursuant to OAC rule 3745-31-05(E).
c.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	See B.7, B.8, b)(2)c and c)(2).
d.	40 CFR Part 63, Subpart A (40 CFR 63.1-15) (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1-15 apply. See B.9.
e.	OAC rule 3745-31-05(E) – voluntary restriction to avoid BAT	See b)(2)d.i and b)(2)d.ii.
f.	OAC rule 3745-31-05(D)(1)(a) – voluntary restriction to avoid major non-attainment new source review	See c)(1), d)(1), e)(1) and B.2 through B.6.



(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compound (OC) emissions from any of these air contaminant source(s) since the uncontrolled potential to emit for OC is less than 10 tons/yr each.
- b. Each day that a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), is employed, the OC emissions from all materials shall not exceed 8 lbs/hr and 40 lbs/day from each emissions unit. The OC emission limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive coatings or clean up materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio State Implementation Plan (SIP) for OCs. After the rule is added to the Ohio SIP, the emission limitations in b)(1)b, and the monitoring, record keeping, reporting and testing requirements related to the hourly limitation, included in d)(1)g, d)(1)l, e)(1)a, e(1)b, f)(1)a and f)(1)b shall be void.
- c. The permittee shall comply with the organic hazardous air pollutant (HAP) emissions limitations, in pounds of HAP emissions per ton of material usage as a rolling, 12-month average, in accordance with Table 3 in 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935) from each emissions unit.
- d. The organic compound (OC) emissions shall not exceed the specified limitations for the listed emissions unit(s):
  - i. R019, R020, R021, R022: The OC emissions shall not exceed 32.44 lbs/day and 5.92 tons/year, each.
  - ii. R023: The organic compound (OC) emissions shall not exceed 20.64 lbs/day and 3.77 tons/year.

c) Operational Restrictions

- (1) The maximum annual gelcoat material(s) usage for the gelcoat operations emissions units group (R019 - R023) shall not exceed 249,176 pounds based upon a rolling, 12-month summation of the material usage rates.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the material usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Material(s) Usage
1	20,765
1 - 2	41,529
1 - 3	62,294
1 - 4	83,059
1 - 5	103,823
1 - 6	124,588
1 - 7	145,353



1 - 8	166,117
1 - 9	186,882
1 - 10	207,647
1 - 11	228,411
1 - 12	249,176

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual material(s) usage limitation shall be based upon a rolling, 12-month summation of the material(s) usage figures.

- (2) The permittee shall comply with any applicable Work Practice Standards in accordance with Table 4 in 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for each emissions unit:

- a. the name and identification of each material employed;
- b. the OC content, the VOC content and the HAP content, in percent by weight, of each material employed;
- c. the weight of each material employed, in lbs;
- d. the weight of any OC thinning materials added to the base materials, in lbs;
- e. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the material(s) usage figures;

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative material(s) usage for each calendar month;

- f. the total number of days each emissions unit was in operation;
- g. the total number of hours each emissions unit was in operation;
- h. a determination of the OC, VOC and HAP emission factors for each gelcoat material based on the equations in Table 1 in 40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780-5935);
- i. the OC, VOC and HAP emissions for each material, in lbs/month, calculated using the emission factor(s) specified in d)(1)h;
- j. the total monthly OC, VOC and HAP emissions, calculated as the sum of the emissions calculated in d)(1)i plus the OC thinning materials emissions, as specified in d)(1)d;
- k. the average OC, VOC and HAP emissions, in lbs/day, for all materials employed (calculated as d)(1)j/d)(1)f); and



- I. the average OC, VOC and HAP emissions, in lbs/hr, for all materials employed (calculated as d)(1)j/d)(1)g).

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, d)(1)g and d)(1)l will be voided entirely.]

- (2) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935).
- (3) Modeling to demonstrate compliance with, the aToxic Air Contaminant Statute<sup>e</sup>, ORC 3704.03(F)(4)(b), was not necessary because each emissions unit=s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year or is subject to a MACT rule in 40 CFR Part 63. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following for each emissions unit:
  - a. each month during which the average hourly OC emission rate exceeded 8 lbs/hr, and the actual average hourly OC emission rate;
  - b. each month during which the average daily OC emission rate exceeded 40 lbs/day, and the actual OC emission rate;
  - c. each month during which the average daily OC emission rate exceeded the specified allowable OC emissions limit, and the actual OC emission rate;
    - i. R019, R020, R021, R022: 32.44 lbs/day, each; and
    - ii. R023: 20.64 lbs/day;
  - d. all exceedances of the rolling, 12-month limitation on material(s) usage; and
  - e. for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative material(s) usage levels.

These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit. If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, e)(1)a and e)(1)b shall be voided.]

- (2) The permittee shall submit annual reports that specify the total OC emissions from each of these emissions unit(s) for the previous calendar year. These reports shall be



submitted by January 31 of each year and shall include the actual tons of OC emitted and the allowable emissions limit, in tons/year of OC.

(3) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935).

f) Testing Requirements

(1) Compliance with the allowable emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The OC emissions shall not exceed 8 lbs/hr for each day that photochemically reactive materials are employed at each emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1)l.

b. Emission Limitation:

The OC emissions shall not exceed 40 lbs/day for each day that photochemically reactive materials are employed at each emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1)k.

c. Emission Limitation:

The OC emissions shall not exceed the specified allowable OC emission limitations for each day that any materials are employed:

i. R019, R020, R021, R022: 32.44 lbs/day each; and

ii. R023: 20.64 lbs/day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1)k.

d. Emission Limitation:

The OC emissions shall not exceed the specified allowable OC emission limitations:

R019, R020, R021, R022: 5.92 tons/year each; and

R023: 3.77 tons/year.



Applicable Compliance Method:

Compliance shall be demonstrated by the summation of the monthly OC emissions, based upon the record keeping requirements specified in d)(1)j, divided by 2000 pounds/ton.

e. Emission Limitation:

The organic HAP emissions, in pounds of HAP emissions per ton of material usage as a rolling, 12-month average, shall not exceed the requirements in Table 3 in 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935).

Applicable Compliance Method:

Compliance may be demonstrated by the calculation of an organic HAP emission factor based upon the record keeping requirements specified in d)(1)h.

- (2) Organic HAP content analysis may be performed in accordance with 40 CFR 63.5797. Alternate organic HAP content determination(s) may be made in accordance with 40 CFR 63.5798.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, f)(1)a and f)(1)b shall be voided.]

g) Miscellaneous Requirements

- (1) All OCs employed in the production processes at these emissions units are photochemically reactive VOCs and HAPs.
- (2) OC emissions from cleanup of equipment associated with these emissions units shall be attributed to emissions unit P902 - acetone rag wiping.



**3. Emissions Unit Group - Resin operations: R024, R025, R026,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
R024	Resin spray booth (stage 6), mechanical application, fiberglass chop & layup for fiberglass reinforced plastic composites production
R025	Resin spray booth (stage 7), mechanical application, fiberglass chop & layup for fiberglass reinforced plastic composites production
R026	Resin spray booth (stage 8), mechanical application, fiberglass chop & layup for fiberglass reinforced plastic composites production

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(a) d)(3).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(b)	See b)(2)a.
b.	OAC rule 3745-21-07(G)(2)	See b)(2)b.
c.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	See B.7, B.8, b)(2)c and c)(2).
d.	40 CFR Part 63, Subpart A (40 CFR 63.1-15) (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1-15 apply. See B.9.
e.	OAC rule 3745-31-05(E) – voluntary restriction to avoid BAT	The organic compound (OC) emissions shall not exceed 40.04 lbs/day and 7.31 tons/yr from each emissions unit in the resin operations emissions units group (R024 – R026).
f.	OAC rule 3745-31-05(D)(1)(a) – voluntary restriction to avoid major non-attainment new source review	See c)(1), d)(1), e)(1) and B.2 through B.6.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compound (OC) emissions from any of these



air contaminant source(s) since the uncontrolled potential to emit for OC is less than 10 tons/yr each.

- b. Each day that a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), is employed, the OC emissions from all materials shall not exceed 8 lbs/hr and 40 lbs/day from each emissions unit. The OC emission limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive coatings or clean up materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio State Implementation Plan (SIP) for OCs. After the rule is added to the Ohio SIP, the emission limitations in b)(1)b, and the monitoring, record keeping, reporting and testing requirements related to the hourly limitation, included in d)(1)g, d)(1)l, e)(1)a, e)(1)b, f)(1)a and f)(1)b shall be void.
- c. The permittee shall comply with the organic hazardous air pollutant (HAP) emissions limitations, in pounds of HAP emissions per ton of material usage as a rolling, 12-month average, in accordance with Table 3 in 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935) from each emissions unit.

c) Operational Restrictions

- (1) The maximum annual resin material(s) usage for the resin operations emissions units group (R024 - R026) shall not exceed 850,973 pounds based upon a rolling, 12-month summation of the material usage rates.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the material usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Material(s) Usage
1	70,914
1 - 2	141,829
1 - 3	212,743
1 - 4	283,658
1 - 5	354,572
1 - 6	425,486
1 - 7	496,401
1 - 8	567,315
1 - 9	638,230
1 - 10	709,144
1 - 11	780,058
1 - 12	850,973

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual material(s) usage limitation shall be based upon a rolling, 12-month summation of the material(s) usage figures.



- (2) The permittee shall comply with any applicable Work Practice Standards in accordance with Table 4 in 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for each emissions unit:

- a. the name and identification of each material employed;
- b. the OC content, the VOC content and the HAP content, in percent by weight, of each material employed;
- c. the weight of each material employed, in lbs;
- d. the weight of any OC thinning materials added to the base materials, in lbs;
- e. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the material(s) usage figures;

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative material(s) usage for each calendar month;

- f. the total number of days each emissions unit was in operation;
- g. the total number of hours each emissions unit was in operation;
- h. a determination of the OC, VOC and HAP emission factors for each resin material based on the equations in Table 1 in 40 CFR, Part 63, Subpart WWWW (40 CFR 63.5780-5935);
- i. the OC, VOC and HAP emissions for each material, in lbs/month, calculated using the emission factor(s) specified in d)(1)h;
- j. the total monthly OC, VOC and HAP emissions, calculated as the sum of the emissions, calculated in d)(1)i plus the OC thinning materials emissions, as specified in d)(1)d;
- k. the average OC, VOC and HAP emissions, in lbs/day, for all materials employed (calculated as d)(1)j/d)(1)f); and
- l. the average OC, VOC and HAP emissions, in lbs/hr, for all materials employed (calculated as d)(1)j/d)(1)g).

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, d)(1)g and d)(1)l will be voided entirely.]

- (2) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935).
- (3) Modeling to demonstrate compliance with, the AToxic Air Contaminant Statute<sup>@</sup>, ORC 3704.03(F)(4)(b), was not necessary because each emissions unit=s maximum annual



emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year or is subject to a MACT rule in 40 CFR Part 63. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following for each emissions unit:
  - a. each month during which the average hourly OC emission rate exceeded 8 lbs/hr, and the actual average hourly OC emission rate;
  - b. each month during which the average daily OC emission rate exceeded 40 lbs/day, and the actual OC emission rate;
  - c. each month during which the average daily OC emission rate exceeded 40.04 lbs/day at R024 – R026 each, and the actual OC emission rate;
  - d. all exceedances of the rolling, 12-month limitation on material(s) usage; and
  - e. for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative material(s) usage levels.

These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit. If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, e)(1)a and e)(1)b shall be voided.]

- (2) The permittee shall submit annual reports that specify the total OC emissions from each of these emissions unit(s) for the previous calendar year. These reports shall be submitted by January 31 of each year and shall include the actual tons of OC emitted and the allowable emissions limit, in tons/year of OC.
- (3) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935).

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

The OC emissions shall not exceed 8 lbs/hr for each day that photochemically reactive materials are employed at each emissions unit.



Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1)l.

b. Emission Limitation:

The OC emissions shall not exceed 40 lbs/day for each day that photochemically reactive materials are employed at each emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1)k.

c. Emission Limitation:

The OC emissions shall not exceed 40.04 lbs/day for each day that any materials were employed at each emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1)k.

d. Emission Limitation:

The OC emissions shall not exceed 7.31 tons/yr at each emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated by the summation of the monthly OC emissions, based upon the record keeping requirements specified in d)(1)j, divided by 2000 pounds/ton.

e. Emission Limitation:

The organic HAP emissions, in pounds of HAP emissions per ton of material usage as a rolling, 12-month average, shall not exceed the requirements in Table 3 in 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935).

Applicable Compliance Method:

Compliance may be demonstrated by the calculation of an organic HAP emission factor based upon the record keeping requirements specified in d)(1)h.

(2) Organic HAP content analysis may be performed in accordance with 40 CFR 63.5797. Alternate organic HAP content determination(s) may be made in accordance with 40 CFR 63.5798.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, f)(1)a and f)(1)b shall be voided.]



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0103932

**Facility ID:** 0204000423

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

g) Miscellaneous Requirements

- (1) All OCs employed in the production processes at these emissions units are photochemically reactive VOCs and HAPs.
- (2) OC emissions from cleanup of equipment associated with these emissions units shall be attributed to emissions unit P902 - acetone rag wiping.