



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

3/11/2009

Mr. Neil Helwig  
Helwig Enterprises Inc.  
5009 Cincinnati-Brookville Road  
Shandon, OH 45063

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1409000699  
Permit Number: P0104431  
Permit Type: Renewal  
County: Butler

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc), from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

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

If you have any questions regarding this permit, please contact the Hamilton County Dept. of Environmental Services. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc).

Sincerely,

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

Cc: HCDOES

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





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

**FINAL**

**Air Pollution Permit-to-Install and Operate  
for  
Helwig Enterprises Inc.**

Facility ID: 1409000699  
Permit Number: P0104431  
Permit Type: Renewal  
Issued: 3/11/2009  
Effective: 3/11/2009  
Expiration: 3/11/2014





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Air Pollution Permit-to-Install and Operate**  
for  
Helwig Enterprises Inc.

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**Final Permit-to-Install and Operate**  
**Permit Number:** P0104431  
**Facility ID:** 1409000699  
**Effective Date:** 3/11/2009

# Authorization

Facility ID: 1409000699  
Application Number(s): A0036867  
Permit Number: P0104431  
Permit Description: Initial FEPTIO for Emissions Units P002, P003, and P004 following PTI 14-05983, issued 1/29/2008.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 3/11/2009  
Effective Date: 3/11/2009  
Expiration Date: 3/11/2014  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Helwig Enterprises Inc.  
5009 CINCINNATI-BROOKVILLE RD  
Ross Twp., OH 45063

of a Permit-to-Install and Operate 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:

Hamilton County Dept. of Environmental Services  
250 William Howard Taft Pkwy.  
Cincinnati, OH 45219-2660  
(513)946-7777

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Final Permit-to-Install and Operate**  
**Permit Number:** P0104431  
**Facility ID:** 1409000699  
**Effective Date:** 3/11/2009

## Authorization (continued)

Permit Number: P0104431  
 Permit Description: Initial FEPTIO for Emissions Units P002, P003, and P004 following PTI 14-05983, issued 1/29/2008.

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

**Emissions Unit ID:** P004  
 Company Equipment ID: P004  
 Superseded Permit Number: 14-05983  
 General Permit Category and Type: Not Applicable

**Group Name: Fiberglass Fabrication Stations**

<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	P002
Superseded Permit Number:	14-05983
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P003</b>
Company Equipment ID:	P003
Superseded Permit Number:	14-05983
General Permit Category and Type:	Not Applicable



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**Final Permit-to-Install and Operate**

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**Facility ID:** 1409000699

**Effective Date:** 3/11/2009

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



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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.



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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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



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change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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

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

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

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



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



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) 2., 3., 4., and 5.

2. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P002 (Spray and Hand Lay-Up Station 1), P003 (Spray and Hand Lay-Up Station 2), P004 (Facility-Wide Cleanup Operations), other de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 tons per year (TPY) for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a 12-month rolling summation.

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

3. The permittee shall collect and record the following information each month for the emissions units identified in 2. above:
  - 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<sup>1</sup> content, recorded in percent by weight, of each coating (resin and gel coat);
  - d. the total individual HAP emissions for each HAP from all organic materials employed, in pounds or tons per month [for each HAP, the product of 3.b. times 3.c, multiplied by the Composite Fabricators Association Unified Emission Factors for Open Molding of Composites for each liquid organic material];
  - e. the updated rolling, 12-month summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding 11 months.
  - f. the total combined HAP emissions from all liquid organic materials employed, in pounds per month; and
  - g. the updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding 11 months.

<sup>1</sup> 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 District Office or local air agency contact. Material Safety Data Sheets



typically include a listing of the HAPs contained in coatings and cleanup materials. This information does not have to be kept on an individual emissions unit basis.

- 4. The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, as 12-month rolling summations.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

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

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

- 5. Compliance with the emission limitations in 2. of these terms and conditions shall be determined in accordance with the following method(s) identified below:
  - a) Emission Limitations:
 

Actual emissions of HAPs shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance with the 12-month rolling HAP limitations shall be demonstrated by the record keeping identified in 3. above.



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**Effective Date:** 3/11/2009

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



**1. P004, Facility-Wide Cleanup**

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

Facility-wide Cleanup Operations

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. 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. b)(1)c., d)(3), and e)(2).
- 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(E)  Voluntary Restriction to Avoid BAT	See b)(2)a. and b)(2)b.
b.	OAC rule 3745-21-07(G)	Exempt based on the use of non-photochemically reactive materials.  See b)(2)c. and b)(2)d.
c.	OAC rule 3745-31-05(D)  Synthetic Minor for Hazardous Air Pollutants (HAPs) to Avoid NESHAP 40 CFR Part 63, Subpart WWWW (Reinforced Plastic Composites Production) and Title V.	See Section B.2.

- (2) Additional Terms and Conditions
  - a. Permit to Install 14-05983 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of



avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) for VOC emissions:

- i. the maximum annual cleanup material usage shall not exceed 2,300 gallons per year, and
- ii. the maximum organic compound (OC) content of solvent used for cleanup shall not exceed 8.43 pounds of OC per gallon of solvent.

- b. The permittee shall not employ cleanup materials containing hazardous air pollutants (HAPs) in this emissions unit.
- c. The use of photochemically reactive cleanup material as defined in OAC rule 3745-21-01(C)(5) is prohibited.
- d. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)b., b)(2)c., d)(1)d., and e)(1)a.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for facility-wide cleanup:
  - a. the company identification for each cleanup material employed;
  - b. the number of gallons of each cleanup material employed;
  - c. the organic compound content of each cleanup material, in pounds per gallon;
  - d. documentation on whether or not each organic cleanup material is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5); and
  - e. documentation on whether or not each cleanup material contains a HAP<sup>1</sup> as identified in Section 112(b) of Title III of the Clean Air Act.

[Note: The definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

<sup>1</sup> 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 District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the HAPs contained in coatings and cleanup materials.



(2) The annual cleanup material usage shall be determined by summing the monthly usage records specified in d)(1)b.

(3) See Section B.3. of this permit.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. an identification of each day that the emissions unit employed photochemically reactive material(s) and a copy of such record(s); and

b. an identification of each day that the emissions unit employed HAP-containing material(s) and a copy of such record(s).

The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

(2) See Section B.4. of this permit.

(3) The permittee shall submit an annual report which specifies the type(s) and total cleanup material usage, in gallons. These reports shall be submitted electronically through Ohio EPA Air Services by January 31 of each year.

(4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in b) of these terms and conditions shall be determined in accordance with the following method(s) identified below:

a. Emission Limitation:

Voluntary restrictions to ensure VOC emissions shall not exceed 9.9 TPY.

Applicable Compliance Method:

The annual VOC emissions voluntary restriction established through OAC rule 3745-31-05(E) was developed from the following equation using the information submitted by the permittee in PTI Application 14-05983, submitted on August 29, 2007:

$2300 \text{ gal cleanup solvent/yr} \times 8.43 \text{ lbs OC/gal cleanup solvent} \times 1 \text{ Ton}/2000 \text{ lbs} = 9.7 \text{ TPY OC from cleanup operations,}$

Where,

All OC emissions are considered to be VOC emissions.



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Compliance with the voluntary emission limitation shall be determined by the record keeping requirements specified in d)(1) and d)(2) of this permit.

- (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.

g) Miscellaneous Requirements

- (1) None.



**2. Emissions Unit Group - Fiberglass Fabrication Stations: P002, P003**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P002	Spray and Hand Layup Station 1 for fabricating fiberglass parts
P003	Spray and Hand Layup Station 2 for fabricating fiberglass parts

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(3), d)(4), d)(5), d)(6), and e)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)c., d)(2), and e)(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)(a)(ii)	See b)(2)a.
b.	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 pounds per hour and 40 pounds per day.  See b)(2)b.
c.	OAC rule 3745-31-05(D)  Synthetic Minor for Hazardous Air Pollutants (HAPs) to Avoid NESHAP 40 CFR Part 63, Subpart WWWW (Reinforced Plastic Composites Production) and Title V.	See Section B.2.  For purposes of federal major stationary source applicability determinations, all annual organic compound emissions are considered volatile organic compound emissions.

- (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 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 limitations of 8 pounds per hour and 40 pounds per day of organic compounds under OAC rule 3745-21-07(G)(2).

b. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)b., d)(1), and e)(1).

c) Operational Restrictions

- (1) The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.
- (2) The permittee shall utilize non-atomized application equipment for the spray application of coatings in this emissions unit.

d) Monitoring and/or Recordkeeping 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 styrene or organic compound content, recorded in percent weight, of each coating (resin or gel coat);
  - d. the total organic compound emission rate for all coatings (resin and gel coat), in pounds per day [the summation of d)(1)b. 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];
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings, i.e., d)(1)d. divided by d)(1)e., in pounds per hour (average).
- (2) See Section B.3. of this permit.
- (3) The federally enforceable permit-to-install and operate (FEPTIO) application for these emission units, P002 and P003, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The AToxic Air Contaminant Statute<sup>®</sup>, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such



as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Review of New Sources of Air Toxic Emissions, Option A, as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
  - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; or
  - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., 24 hours per day and 7 days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Toxic Contaminant: styrene

TLV (mg/m3): 85.20

Maximum Hourly Emission Rate (lbs/hr): 16 (P002 and P003 combined)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 470.5

MAGLC (ug/m3): 2029

The permittee, has demonstrated that emissions of styrene, from emission units P002 and P003, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall



not be applied without evaluating each component toxic air contaminant in accordance with the AToxic Air Contaminant Statute<sup>®</sup>, ORC 3704.03(F).

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

If the permittee determines that the AToxic Air Contaminant Statute<sup>®</sup> will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the AToxic Air Contaminant Statute<sup>®</sup>, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

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



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

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

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. an identification of each day during which the average hourly organic compound emissions from the coatings exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and

b. an identification of each day during which the organic compound emissions from the coatings exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

(2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

(3) See Section B.4. of this permit.

(4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in b) of these terms and conditions shall be determined in accordance with the following method(s) identified below:

a. Emission Limitations:



OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Method:

Compliance with the OC emission limitations for this emissions unit shall be demonstrated by the record keeping required in d)(1) using the most recent emissions factors from the Unified Emissions Factors for Open Molding of Composites published by the Composite Fabricators Association (CFA). The appropriate emissions factors are based on the percent styrene and methyl methacrylate in the coating, by weight, and the method of coating application.

Allowable annual OC/VOC emissions were determined to be less than 9.9 TPY based on 8 pounds of OC per hour x 8760 hours/year divided by 2000 pounds per ton = 7.3 TPY OC.

- (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.
- g) Miscellaneous Requirements
- (1) None.