



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

3/24/2009

**Certified Mail**

John Covey  
Plas-Tanks Industries, Inc.  
39 Standen Drive  
Hamilton, OH 45015-2209

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

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 1409040850  
Permit Number: P0104378  
Permit Type: Administrative Modification  
County: Butler

Dear Permit Holder:

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

The issuance of this PTI 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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. 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 <http://www.epa.state.oh.us/dapc>.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*  
Hamilton County Dept. of Environmental Services

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  
for  
Plas-Tanks Industries, Inc.**

Facility ID: 1409040850  
Permit Number: P0104378  
Permit Type: Administrative Modification  
Issued: 3/24/2009  
Effective: 3/24/2009





State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Air Pollution Permit-to-Install**  
 for  
 Plas-Tanks Industries, Inc.

**Table of Contents**

Authorization ..... 1

A. Standard Terms and Conditions ..... 3

    1. Federally Enforceable Standard Terms and Conditions ..... 4

    2. Severability Clause ..... 4

    3. General Requirements ..... 4

    4. Monitoring and Related Record Keeping and Reporting Requirements ..... 5

    5. Scheduled Maintenance/Malfunction Reporting ..... 6

    6. Compliance Requirements ..... 6

    7. Best Available Technology ..... 7

    8. Air Pollution Nuisance ..... 7

    9. Reporting Requirements ..... 7

    10. Applicability ..... 8

    11. Construction of New Sources(s) and Authorization to Install ..... 8

    12. Permit-To-Operate Application ..... 9

    13. Construction Compliance Certification ..... 9

    14. Public Disclosure ..... 9

    15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations ..... 9

    16. Fees ..... 9

    17. Permit Transfers ..... 10

    18. Risk Management Plans ..... 10

    19. Title IV Provisions ..... 10

B. Facility-Wide Terms and Conditions ..... 11

C. Emissions Unit Terms and Conditions ..... 13

    1. Emissions Unit Group - Tank Fabrication Stations: P001, P002, P003, P004, P005, and P006 ..... 14





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104378  
**Facility ID:** 1409040850  
**Effective Date:** 3/24/2009

## Authorization

Facility ID: 1409040850  
Facility Description: Fabricator of fiberglass tanks  
Application Number(s): M0000342  
Permit Number: P0104378  
Permit Description: Administrative Modification of PTI 14-05356, issued 7/14/2005, to Reconcile OC Emissions and MACT Record Keeping Requirements  
Permit Type: Administrative Modification  
Permit Fee: \$600.00  
Issue Date: 3/24/2009  
Effective Date: 3/24/2009

This document constitutes issuance to:

Plas-Tanks Industries, Inc.  
39 Standen Drive  
Hamilton, OH 45015-2209

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:

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 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: P0104378  
Permit Description: Administrative Modification of PTI 14-05356, issued 7/14/2005, to Reconcile OC Emissions and MACT Record Keeping Requirements

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

**Group Name: Tank Fabrication Stations**

<b>Emissions Unit ID:</b>	
Company Equipment ID:	Station #1
Superseded Permit Number:	14-05356
General Permit Category and	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	
Company Equipment ID:	Station #2
Superseded Permit Number:	14-05356
General Permit Category and	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	
Company Equipment ID:	Station #3
Superseded Permit Number:	14-05356
General Permit Category and	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	
Company Equipment ID:	Station #4
Superseded Permit Number:	14-05356
General Permit Category and	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	
Company Equipment ID:	Station #5
Superseded Permit Number:	14-05356
General Permit Category and	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	
Company Equipment ID:	Station #6
Superseded Permit Number:	14-05356
General Permit Category and	Not Applicable
Type:	



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104378  
**Facility ID:** 1409040850  
**Effective Date:** 3/24/2009

## **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 Hamilton County Dept. of Environmental Services.



(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 Hamilton County Dept. of Environmental Services. 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 Hamilton County Dept. of Environmental Services 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 Hamilton County Dept. of Environmental Services 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 Hamilton County Dept. of Environmental Services 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 Hamilton County Dept. of Environmental Services.
- 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 Hamilton County Dept. of Environmental Services. 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 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.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104378  
**Facility ID:** 1409040850  
**Effective Date:** 3/24/2009

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Hamilton County Dept. of Environmental Services 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.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
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## **B. Facility-Wide Terms and Conditions**



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104378  
**Facility ID:** 1409040850  
**Effective Date:** 3/24/2009

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. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production: P001, P002, P003, P004, P005, and P006. 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 appropriate Ohio EPA District Office or local air agency.

The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart WWWW. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 15 of 40 CFR Part 63, Subpart WWWW. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart WWWW and Subpart A.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104378  
**Facility ID:** 1409040850  
**Effective Date:** 3/24/2009

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



**1. Emissions Unit Group - Tank Fabrication Stations: P001, P002, P003, P004, P005, and P006**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P001	Station 1 - Fiberglass tank fabrication using spray, filament winding, and hand layup
P002	Station 2 - Fiberglass tank fabrication using spray, filament winding, and hand layup
P003	Station 3 - Fiberglass tank fabrication using spray, filament winding, and hand layup
P004	Station 4 - Fiberglass tank fabrication using spray, filament winding, and hand layup
P005	Station 5 - Fiberglass tank fabrication using spray, filament winding, and hand layup
P006	Station 6 - Fiberglass tank fabrication using spray, filament winding, and hand layup

- 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) None.
- 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.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 7.3 tons per year (TPY) from coating materials.  Organic compound (OC) emissions shall not exceed 250 pounds per day from cleanup materials employed by emissions units P001, P002, P003, P004, P005, and P006, combined.  See b)(2)a., b)(2)b., b)(2)c., c)(2), and c)(3).  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and 40 CFR Part 63, Subpart WWWW.
b.	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 pounds per hour from coating materials (resins and gel coats, excluding cleanup materials).  Organic compound (OC) emissions shall not exceed 40 pounds per day from coating materials (resins and gel coats,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		excluding cleanup materials). See b)(2)d., c)(1), and c)(4).
c.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)  [In accordance with 63.5805(b), each emissions unit is an open molding corrosion resistant and/or high strength resin and gel coat operation at an existing reinforced plastic composites production facility subject to the emission limitations and work practices specified in this section.]	Table 3 to 40 CFR Part 63, Subpart WWWW - Organic Hazardous Air Pollutant (HAP) Emission Limits for Specific Open Molding, Centrifugal Casting, Pultrusion, and Continuous Lamination/Casting Operations shows which emission limits apply to each emissions unit based upon the type of operation and the method of resin and gel coat application. [40 CFR 63.5805(b)]  Table 4 to 40 CFR Part 63, Subpart WWWW - Work Practice Standards shows which work standards apply to each emissions unit. [40 CFR 63.5805(b)]
d.	40 CFR 63.1-15, Subpart A (40 CFR 63.5925)	Table 15 to 40 CFR Part 63, Subpart WWWW - Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR Part 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The total amount of cleanup material evaporated in emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 250 pounds per day (or 37.88 gallons per day based on acetone).
- b. The maximum annual OC emissions from cleanup materials employed by emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 45.63 TPY OC, as a rolling 12-month summation.
- c. The maximum OC content of the cleanup material employed in emissions units P001, P002, P003, P004, P005, and P006 shall not exceed 6.6 pounds of OC per gallon.
- 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., c)(1), c)(4), d)(1), d)(2)e., e)(1), e)(3)a., and e)(3)b.



- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by material usage limits, the use of accurate material measurements to determine gel coat, resin, and cleanup material usage, OC emissions limitations, record keeping, and reporting.
- c) Operational Restrictions
- (1) The permittee shall employ coating materials (resins and gel coats) with a combination of resin or gel coat type (vapor suppressed or non-vapor suppressed), organic compound content, method of application, and usage quantity that are sufficient to comply with the allowable OC emission limitations specified in b)(1) of the terms and conditions of this permit and as required by OAC rule 3745-21-07(G)(2).
  - (2) The permittee shall employ only non-HAP-containing cleanup materials in each emissions unit.
  - (3) The permittee shall keep containers that store HAP-containing coating materials and cleanup materials closed or covered, except during the addition or removal of materials.
  - (4) The permittee shall employ only non-photochemically reactive cleanup material in each emissions unit.
  - (5) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935).
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each day for each emissions unit:
    - a. The company identification for each coating material (resin and gel coat) applied;
    - b. The type of each resin and gel coat applied (non-vapor suppressed or vapor suppressed);
    - c. The number of pounds of each resin and gel coat applied by each method of application (i.e. manual, atomized mechanical, non-atomized mechanical, etc.);
    - d. The total weight percent of organic HAP of each resin and gel coat applied;
    - e. The calculated OC (assumed equal to the organic HAP) emission factor using the equations to calculate organic HAP emission factors from Table 1 of 40 CFR Part 63, Subpart WWWW, in pounds of OC per ton of resin or gel coat applied;
    - f. The total daily OC emission rate for all resins and gel coats applied, in pounds per day [d)(1)c. divided by 2000 x d)(1)e.];
    - g. The number of hours the emissions unit was in operation; and,
    - h. The average hourly OC emission rate for all resins and gel coats applied, in pounds per hour [d)(1)f. divided by d)(1)g.].
  - (2) The permittee shall collect and record the following cleanup material information each day for emissions units P001, P002, P003, P004, P005, and P006, combined:



- a. The company identification for each cleanup material employed;
  - b. The total number of gallons of cleanup material evaporated each day in emissions units P001, P002, P003, P004, P005, and P006, combined. Evaporated cleanup material is equal to [the amount of virgin solvent dispensed plus recycled cleanup solvent from the previous day] minus [the cleanup solvent left at the end of the day].
  - c. The OC content of the cleanup material, in pounds per gallon;
  - d. The daily OC emissions from cleanup materials evaporated in emissions units P001, P002, P003, P004, P005, and P006, combined, in pounds per day  $d)(2)b. \times d)(2)c.$ ;
  - e. A record of each liquid organic cleanup material employed in this emissions unit indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5);
  - f. A record of each liquid organic cleanup material employed in this emissions unit indicating whether or not the liquid organic material contains HAPs as identified in Section 112(b) of the Clean Air Act;
  - g. The permittee may record the evaporation of cleanup materials in pounds per day, instead of gallons as specified in d)(2)b. above, if the cleanup materials are weighed; and
  - h. The permittee shall retain records of cleanup material analyses for the solvent and solids content of cleanup material sent out for disposal.
- (3) The permittee shall collect and record the following cleanup material information each month for emissions units P001, P002, P003, P004, P005, and P006, combined:
- a. The total OC emission rate from cleanup materials employed in emissions units P001, P002, P003, P004, P005, and P006, combined, in pounds per month [summation of the daily records in d)(2)d. above for the calendar month]; and
  - b. The rolling, 12-month summation of the monthly OC emission rates from cleanup materials employed in emissions units P001, P002, P003, P004, P005, and P006, combined, in tons [summation of the OC emissions, as recorded in d)(3)a. above, for the present month plus the previous 11 months of operation, divided by 2,000 pounds].

The permittee has existing cleanup material records; therefore, cumulative cleanup material emission limitations are not needed for the first year of operation after issuance of this permit.

- (4) The permittee shall operate and maintain metering equipment to measure the amount of all resins and gel coats used in each emissions unit. The permittee shall calibrate the metering equipment to measure the amount, in weight or volume, of all resins and gel coats used in each emissions unit as necessary or appropriate to maintain the accuracy of the measurements guaranteed or specified by the manufacturer of the metering



equipment, or to an accuracy of within plus or minus five percent (5%) of the true value, whichever is more stringent.

Calibration and accuracy tests consistent with the metering equipment manufacturer specifications shall be conducted semi-annually. If the manufacturer does not warrant or specify the calibration data or the accuracy of the material measurements for the metering equipment, the permittee shall perform calibration and accuracy tests on the metering equipment on a monthly basis during the first six months of operation of the meters. The permittee calibration and accuracy tests for the metering equipment shall include two resins (the highest and lowest density resins) and two gel coats (the highest and lowest density gel coats). After completing six months of calibration and accuracy tests of the metering equipment and upon approval from the Hamilton County Department of Environmental Services, the permittee shall conduct calibration and accuracy tests semi-annually.

- (5) The permittee shall operate and maintain measuring equipment to measure the amount of cleanup materials employed in emissions units P001 through P006. The permittee shall calibrate the measuring equipment to measure the amount, in weight or volume, of all cleanup materials employed in emissions units P001 through P006 as necessary or appropriate to maintain the accuracy of the measurements guaranteed or specified by the manufacturer of the measuring equipment, or to an accuracy of within plus or minus five percent (5%) of the true value, whichever is more stringent.

Calibration and accuracy tests consistent with the measuring equipment manufacturer specifications shall be conducted semi-annually. If the manufacturer does not warrant or specify the calibration data or the accuracy of the material measurements for the measuring equipment, the permittee shall perform calibration and accuracy tests on the measuring equipment on a monthly basis during the first six months of operation of the measuring equipment. The permittee calibration and accuracy tests for the measuring equipment shall include the cleanup material employed by the permittee. After completing six months of calibration and accuracy tests of the measuring equipment and upon approval from the Hamilton County Department of Environmental Services, the permittee shall conduct calibration and accuracy tests semi-annually.

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

e) Reporting Requirements

- (1) The permittee shall notify the Hamilton County Department of Environmental Services in writing of each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in each emissions unit. The notification shall include a copy of such record and shall be sent to the County Department of Environmental Services within 45 days after the exceedance occurs.
- (2) The permittee shall notify the Hamilton County Department of Environmental Services in writing of each day during which any HAP-containing cleanup material was employed in each emissions unit. The notification shall include a copy of such record and shall be sent to the County Department of Environmental Services within 45 days after the exceedance occurs.
- (3) The permittee shall submit quarterly deviation (excursion) reports that include the following information:



- a. an identification of each hour during which the organic compound emissions from the coating materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour;
- b. an identification of each day during which the organic compound emissions from the coating materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day;
- c. an identification of all exceedances of the daily OC emission limitation of 250 pounds per day for cleanup materials employed by emissions units P001, P002, P003, P004, P005, and P006, combined;
- d. an identification of all exceedances of the OC content limitation for cleanup materials of 6.6 pounds of OC per gallon; and
- e. an identification of all exceedances of the rolling, 12-month OC emission limitation of 45.63 TPY for cleanup materials employed by emissions units P001, P002, P003, P004, P005, and P006, combined.

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

- (4) The permittee shall submit annual reports that specify the total OC emissions from coatings employed in each emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for each emissions unit in the annual Fee Emission Report.
  - (5) Upon replacement and/or initial operation of any metering or measuring equipment as specified in d)(4) and d(5) of this permit, the permittee shall provide the Hamilton County Department of Environmental Services the following information: the name of the manufacturer of the metering/measuring equipment, the make and model of the metering/measuring equipment, calibration data (e.g., volume of coating per pump stroke), a copy of the manufacturer's specifications and warranty for the accuracy of the metering/measuring equipment and the actual accuracy of the material measurements (by weight or by volume) recorded for the metering/measuring equipment.
  - (6) The permittee shall submit calibration and accuracy test results for the metering equipment and measuring equipment specified in d(4) and d(5) of the terms and conditions of this permit. The calibration and accuracy tests results shall be submitted to the Hamilton County Department of Environmental Services by January 30 and July 30 of each calendar year, and shall cover the previous six-month period.
  - (7) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935).
- 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 from coating materials (resins and gel coats, excluding cleanup materials);

OC emissions shall not exceed 40 pounds per day from coating materials (resins and gel coats, excluding cleanup materials); and

Organic compound (OC) emissions shall not exceed 7.3 tons per year (TPY) from coating materials.

Applicable Compliance Method:

Compliance with the hourly and daily emission limitations shall be based upon the record keeping specified in d)(1).

As provided by 40 CFR Part 63.5797, in order to determine the OC content (assumed equal to the organic HAP content) of resins and gel coats and the associated emission factors from Table 1 as referenced in d)(1)e., the permittee may use information provided by the material manufacturer, such as manufacturer's formulation data and associated documentation of vapor suppression effectiveness factors, material safety data sheets (MSDS), and other similar information and data.

Compliance with the annual OC emission limitation shall be demonstrated by compliance with the daily emission limitation. The permittee shall sum the daily OC emissions for the calendar year as collected in the record keeping specified in d)(1) and shall report annual OC emissions as specified in e(5).

b. Emission Limitation:

OC emissions shall not exceed 250 pounds per day from cleanup materials employed by emissions units P001, P002, P003, P004, P005, and P006, combined.

Applicable Compliance Method:

Compliance with the daily emission limitation for cleanup materials shall be based upon the record keeping specified in d)(2).

c. Emission Limitation:

The maximum annual OC emissions from cleanup materials employed by emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 45.63 TPY OC, as a rolling 12-month summation.

Applicable Compliance Method:

Compliance with the rolling 12-month OC emission limitation for cleanup materials employed shall be based upon the record keeping specified in d)(3).



d. Emission Limitation:

The maximum OC content of the cleanup material employed in emissions units P001, P002, P003, P004, P005, and P006 shall not exceed 6.6 pounds of OC per gallon.

Applicable Compliance Method:

Compliance with the OC content emission limitation for cleanup materials shall be based upon the record keeping specified in d)(2).

U.S. EPA Method 24 or manufacturer formulation data shall be used to determine the OC content of the cleanup materials.

e. Emission Limitation:

Table 3 to 40 CFR Part 63, Subpart WWWW - Organic Hazardous Air Pollutant (HAP) Emission Limits for Specific Open Molding, Centrifugal Casting, Pultrusion, and Continuous Lamination/Casting Operations shows which emission limits apply to each emissions unit based upon the type of operation and the method of resin and coating application. [40 CFR 63.5805(b)]

Applicable Compliance Method:

Compliance with the organic HAP emission limitations found in 40 CFR Part 63, Subpart WWWW, shall be based upon the record keeping specified in 40 CFR Part 63.5780-5935.

g) Miscellaneous Requirements

- (1) The terms and conditions of this permit to install shall supersede the terms and conditions of permit to install 14-05356, issued on July 14, 2005.