



State of Ohio Environmental Protection Agency

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50 W. Town St., Suite 700
Columbus, Ohio 43215

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

5/11/2009

Certified Mail

Mr. David Zundel
Iten Industries Inc. (Plant 3)
P.O. Box 2150
4602 Benefit Avenue
Ashtabula, OH 44004

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0204010442
Permit Number: P0104288
Permit Type: Initial Installation
County: Ashtabula

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
Yes	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 (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 Ohio EPA DAPC, Northeast District Office. 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, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA DAPC, Northeast District Office

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
Iten Industries Inc. (Plant 3)**

Facility ID: 0204010442
Permit Number: P0104288
Permit Type: Initial Installation
Issued: 5/11/2009
Effective: 5/11/2009



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Air Pollution Permit-to-Install
 for
 Iten Industries Inc. (Plant 3)

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0104288
Facility ID: 0204010442
Effective Date: 5/11/2009

Authorization

Facility ID: 0204010442
Facility Description: Fiberglass reinforced plastic manufacturing
Application Number(s): A0036676, A0036684, A0036685
Permit Number: P0104288
Permit Description: Installation of two SMC machines and a facility-wide cleanup operation
Permit Type: Initial Installation
Permit Fee: \$1,200.00
Issue Date: 5/11/2009
Effective Date: 5/11/2009

This document constitutes issuance to:

Iten Industries Inc. (Plant 3)
1303 West 38th Street
Ashtabula, OH 44004

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0104288
Facility ID: 0204010442
Effective Date: 5/11/2009

Authorization (continued)

Permit Number: P0104288

Permit Description: Installation of two SMC machines and a facility-wide cleanup operation

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

Emissions Unit ID:	P016
Company Equipment ID:	SMC machine 24" width, IG Brenner
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P017
Company Equipment ID:	SMC machine 48" width
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P018
Company Equipment ID:	Cold cleaning acetone all emission units at this facility
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0104288
Facility ID: 0204010442
Effective Date: 5/11/2009

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 Ohio EPA DAPC, Northeast District Office.



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

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

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

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

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

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



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

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

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



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

10. Applicability

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

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

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



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

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

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

14. Public Disclosure

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

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

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

16. Fees

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



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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0104288
Facility ID: 0204010442
Effective Date: 5/11/2009

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0104288
Facility ID: 0204010442
Effective Date: 5/11/2009

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: P016, P017 and P018. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northeast District Office.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0104288
Facility ID: 0204010442
Effective Date: 5/11/2009

C. Emissions Unit Terms and Conditions



1. P016, SMC machine 24" width, IG Brenner

Operations, Property and/or Equipment Description:

SMC #1

- 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.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Organic hazardous air pollutants (HAP) shall not exceed emissions standards as specified in 40 CFR 63.5805, Subpart WWWW.
b.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Work practice standards in Table 4 of Subpart WWWW. See b)(2)b and b)(2)c.
c.	40 CFR Part 63.1-15 (40 CFR 63.5925)	Table 15 to Subpart WWWW - Applicability of General Provisions, Subpart A.
d.	OAC rule 3745-21-07(G)(2)	Organic compounds (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See b)(2)a.

(2) Additional Terms and Conditions

- a. The OC emission limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive materials (PRM) are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in sections b)(1)d, d)(2), e)(2)a, e)(2)b and f)(1)b shall be void.
- b. The permittee shall close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open.
- c. The permittee shall use a nylon containing film to enclose SMC.



c) Operational Restrictions

- (1) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring and/or record keeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW, (40 CFR 63.5780-5935).

- (2) The permittee shall maintain daily records for this emissions unit:

- a. the company identification for each resin applied;
- b. pounds of each resin applied;
- c. the weight percent of OC (e.g., styrene and methyl methacrylate) for each resin applied;
- d. the total OC emission rate for all resins applied, as calculated by the following equation, in pounds per day:

$$OC \text{ (lbs/day)} = \sum_i^n \text{available HAP} \times EF$$

where:

i = pounds of available HAP in each resin applied;
n = number of resins applied; and
EF = each site specific emissions factor.

(EF = 0.0267 lb of HAP emissions emitted / lb of available HAP in resin applied, US EPA's Hazardous Air Pollutant Emissions from the Production of Reinforced Plastic Composites, May 2001, or the use of an EF the with written approval from Ohio EPA).

- e. the total number of hours in operation; and
- f. the average hourly OC emission rate for all resins applied, i.e., (d)/(e), in pounds per hour (average).

e) Reporting Requirements

- (1) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW, (40 CFR 63.5780-5935).
- (2) The permittee shall submit quarterly deviation (excursion) reports that include the following information:



- a. an identification of each day when the average hourly OC emissions exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;
- b. an identification of each day when the OC emissions exceeded 40 pounds per day, and the actual OC emissions for each such day;
- c. an identification of each day when the resin delivery system to the doctor box, was not closed or covered (if there were no deviations, provide a statement that there were no deviations with this work practice, that is, the resin delivery system to the doctor box was closed or covered for the reporting period); and
- d. an identification of each day when nylon containing film was not used to enclose SMC (if there were no deviations, provide a statement that there were no deviations with this work practice, that is, nylon containing film was used to enclose SMC for the reporting period.).

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

- (3) The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

f) Testing Requirements

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

- a. Emission Limitation:

Organic HAP shall not exceed emissions standards as specified in 40 CFR 63.5805, Subpart WWWW.

Applicable Compliance Method:

Applicable requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935).

- b. Emission Limitation:

8 lbs OC/hr and 40 lbs OC/day

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2) of these terms and conditions.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25, 25A, 204, 204A-F, 205 or other approved methods as appropriate.



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Division of Air Pollution Control

Final Permit-to-Install
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g) Miscellaneous Requirements

(1) None.



2. P017, SMC machine 48" width

Operations, Property and/or Equipment Description:

SMC #2

- 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.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Organic hazardous air pollutants (HAP) shall not exceed emissions standards as specified in 40 CFR 63.5805, Subpart WWWW.
b.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Work practice standards in Table 4 of Subpart WWWW. See b)(2)b and b)(2)c.
c.	40 CFR Part 63.1-15 (40 CFR 63.5925)	Table 15 to Subpart WWWW - Applicability of General Provisions, Subpart A.
d.	OAC rule 3745-21-07(G)(2)	Organic compounds (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See b)(2)a.

(2) Additional Terms and Conditions

- a. The OC emission limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive materials (PRM) are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in sections b)(1)d, d)(2), e)(2)a, e)(2)b and f)(1)b shall be void.
- b. The permittee shall close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open.
- c. The permittee shall use a nylon containing film to enclose SMC.



c) Operational Restrictions

- (1) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW, (40 CFR 63.5780-5935).

- (2) The permittee shall maintain daily records for this emissions unit:

- a. the company identification for each resin applied;
- b. pounds of each resin applied;
- c. the weight percent of OC (e.g., styrene and methyl methacrylate) for each resin applied;
- d. the total OC emission rate for all resins applied, as calculated by the following equation, in pounds per day:

$$OC \text{ (lbs/day)} = \sum_i^n \text{available HAP} \times EF$$

where:

i = pounds of available HAP in each resin applied;
n = number of resins applied; and
EF = each site specific emissions factor.

(EF = 0.0267 lb of HAP emissions emitted / lb of available HAP in resin applied, US EPA's Hazardous Air Pollutant Emissions from the Production of Reinforced Plastic Composites, May 2001, or the use of an EF with the written approval from Ohio EPA).

- e. the total number of hours in operation; and
- f. the average hourly OC emission rate for all resins applied, i.e., (d)/(e), in pounds per hour (average).

e) Reporting Requirements

- (1) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW, (40 CFR 63.5780-5935).
- (2) The permittee shall submit quarterly deviation (excursion) reports that include the following information:



- a. an identification of each day when the average hourly OC emissions exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;
- b. an identification of each day when the OC emissions exceeded 40 pounds per day, and the actual OC emissions for each such day;
- c. an identification of each day when the resin delivery system to the doctor box, was not closed or covered (if there were no deviations, provide a statement that there were no deviations with this work practice, that is, the resin delivery system to the doctor box was closed or covered for the reporting period); and
- d. an identification of each day when nylon containing film was not used to enclose SMC (if there were no deviations, provide a statement that there were no deviations with this work practice, that is, nylon containing film was used to enclose SMC for the reporting period.).

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

- (3) The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

f) Testing Requirements

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

a. Emission Limitation:

Organic HAP shall not exceed emissions standards as specified in 40 CFR 63.5805, Subpart WWWW.

Applicable Compliance Method:

Applicable requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935).

b. Emission Limitation:

8 lbs OC/hr and 40 lbs OC/day

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2) of these terms and conditions.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25, 25A, 204, 204A-F, 205 or other approved methods as appropriate.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0104288
Facility ID: 0204010442
Effective Date: 5/11/2009

g) Miscellaneous Requirements

(1) None.



3. P018, Cold cleaning acetone all emission units at this facility

Operations, Property and/or Equipment Description:

Facility-wide cleanup operations for all fiberglass reinforced plastic operations

- 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.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Work practice standards in Table 4 of Subpart WWWW.
b.	40 CFR Part 63.1-15 (40 CFR 63.5925)	Table 15 to Subpart WWWW - Applicability of General Provisions, Subpart A.
c.	OAC rule 3745-31-05(A)(3)	Total OC emissions emitted from all cleanup materials from all fiberglass reinforced plastic operations shall not exceed 24 tons per year. See c)(1) and c)(2).
d.	OAC rule 3745-21-07(G)(2)	Exempt. See b)(2)a and c)(2).

- (2) Additional Terms and Conditions
 - a. The permittee is exempt from the OC emission limitations in OAC rule 3745-21-07(G)(2) because no photochemically reactive materials (PRM) are employed during cleanup operations. OAC rule 3745-21-07(G)(2) shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, any terms and conditions associated with OAC rule 3745-21-07(G)(2) shall be void.
- c) Operational Restrictions
 - (1) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935).
 - (2) The permittee shall use only non-HAP, non-VOC and non-PRM (e.g., acetone) for cleanup.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring and/or record keeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW, (40 CFR 63.5780-5935).
- (2) The permittee shall maintain the following monthly records for this emissions unit:
 - a. the name and identification number of each cleanup material applied;
 - b. an identification of each cleanup material applied as to whether it is a VOC, a PRM or contains HAP;
 - c. density and OC weight fraction or density and OC volume fraction of each cleanup material applied;
 - d. weight or volume of each cleanup material applied;
 - e. total OC emission rate for all cleanup materials applied, in lbs/month;
 - f. if a credit for recovered cleanup materials is to be used to demonstrate compliance, records of the total amount (lbs) of cleanup material collected and added to the recovery container, for recycle, recovery, and/or disposal at an outside facility, shall be maintained in the following manner:
 - i. the date the materials from the recovery container were shipped off site; and
 - ii. the number of gallons or pounds of materials from the recovery container shipped off site; and
 - g. a credit of recovered cleanup material may be used to adjust the amount of OC emissions in section d)(2)e.

e) Reporting Requirements

- (1) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart WWWW, (40 CFR 63.5780-5935).
- (2) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each month during which any HAP-containing, VOC-containing or PRM cleanup materials were used, and the actual monthly VOC and individual HAP emissions for each such month.

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

- (3) The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.



f) Testing Requirements

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

a. Emission Limitation:

Total OC emissions emitted from all cleanup materials from all fiberglass reinforced plastic operations shall not exceed 24 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2) of these terms and conditions.

g) Miscellaneous Requirements

(1) None.