



State of Ohio Environmental Protection Agency

STREET ADDRESS:

MAILING ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

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

8/13/2009

Certified Mail

DAVE ZUNDEL
ITEN INDUSTRIES, INC., PLANT 4
P.O. BOX 2150
ASHTABULA, OH 44005-2150

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0204010405
Permit Number: P0104325
Permit Type: Initial Installation
County: Ashtabula

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

Dear Permit Holder:

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

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

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

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

Sincerely,

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

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

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



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

The installation of eight (8) pultrusion machines, four (4) mixers, three (3) compression molding machines, one (1) continuous sheet pultrusion machine, one (1) dog bone saw and one (1) facility-wide cleanup operation.

3. Facility Emissions and Attainment Status:

This facility is located in Ashtabula County, which is classified as non-attainment for ozone. The facility has twenty-three (23) injection mold presses. The facility is an existing area source.

4. Source Emissions:

The following table provides potential and restricted emissions:

Emissions units	Descriptions:	PTE rule based OAC rule 3745-21-07(G)(2) TPY (styrene)	PTE based on 8,760 hours per year at maximum capacity TPY (styrene)	Restricted potential emissions TPY (styrene)	Non-VOC, non-HAP, non-PRM emissions TPY (acetone)
P001	Pultrusion machine	7.3		6.3	
P002	Pultrusion machine	7.3		6.3	
P003	Pultrusion machine	7.3		6.3	
P004	Pultrusion machine	7.3		6.3	
P005	Pultrusion machine	7.3		6.3	
P006	Pultrusion machine	7.3		6.3	
P007	Pultrusion machine	7.3		2.4	
P008	Pultrusion machine	7.3		6.3	
P009	Mixer		7.9	7.3	
P010	Mixer (de minimis)	0.8		0.8	
P011	Dog bone saw (PE only)				
P012	Continuous sheet	7.3		7.3	

	pultrusion machine				
P013	Cleanup operation				24
P014	Mixer		7.9	7.3	
P015	Mixer		7.9	7.3	
P016	Liquid compound molding machine		17.7	7.3	
P017	Liquid compound molding machine		17.7	7.3	
P018	Liquid compound molding machine		17.7	7.3	
Total PTE (TPY):			143.3	98.4	24

5. Conclusion:

The facility will restrict their facility-wide VOC emissions to below 100 TPY to 98.4 TPY for avoiding non-attainment NSR. The facility will demonstrate compliance with this restricted VOC limit by operating all pultrusion machines with wet-area enclosures, achieving a VOC reduction of 60 percent by weight, and by calculating and tracking actual monthly VOC emission rates for all emissions units.

6. Please provide additional notes or comments as necessary:

In accordance with 40 CFR 63.5800 and Table 2 of 40 CFR Part 63, Subpart WWWW, this facility is an existing area source that became a major source after the date of publication of this Subpart, and will be subject to the requirements of this Subpart after 3 years of becoming a major source, which is 3 years from the issuance date of this final permit; however, the facility has chosen to comply with the MACT emissions limits and work practices in 40 CFR Part 63, Subpart WWWW upon startup of all emissions units that are in this final permit. In doing so, the facility will be exempted from requirements under OAC 3745-114.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	122.4
VOC	98.4

PUBLIC NOTICE
Issuance Of Draft Air Pollution Permit-To-Install
ITEN INDUSTRIES, INC., PLANT 4

Issue Date: 8/13/2009

Permit Number: P0104325

Permit Type: Initial Installation

Permit Description: Installation of 8 pultrusion machine, 1 sheet pultrusion machine, 4 mixers, 3 compression molding machines, 1 dogbone saw and facility-wide cleanup operation

Facility ID: 0204010405

Facility Location: ITEN INDUSTRIES, INC., PLANT 4
3500 NORTH RIDGE WEST,
Ashtabula, OH 44004

Facility Description: Laminated Plastics Plate, Sheet (except Packaging), and Shape Manufacturing

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



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

DRAFT

**Air Pollution Permit-to-Install
for
ITEN INDUSTRIES, INC., PLANT 4**

Facility ID: 0204010405
Permit Number: P0104325
Permit Type: Initial Installation
Issued: 8/13/2009
Effective: To be entered upon final issuance



Air Pollution Permit-to-Install
for
ITEN INDUSTRIES, INC., PLANT 4

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104325

Facility ID: 0204010405

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0204010405

Facility Description: Manufacturing Facility

Application Number(s): A0036687, A0036689, A0036690, A0036691, A0036692, A0036693, A0036694, A0036695, A0036701, A0036702, A0036703, A0036716, A0036717, A0036718, A0036719, A0036720, A0036743, A0036746

Permit Number: P0104325

Permit Description: Installation of 8 pultrusion machine, 1 sheet pultrusion machine, 4 mixers, 3 compression molding machines, 1 dogbone saw and facility-wide cleanup operation

Permit Type: Initial Installation

Permit Fee: \$3,700.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 8/13/2009

Effective Date: To be entered upon final issuance

This document constitutes issuance to:

ITEN INDUSTRIES, INC., PLANT 4
3500 NORTH RIDGE WEST
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



Authorization (continued)

Permit Number: P0104325

Permit Description: Installation of 8 pultrusion machine, 1 sheet pultrusion machine, 4 mixers, 3 compression molding machines, 1 dogbone saw and 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:	P007
Company Equipment ID:	Pultrusion unit with cut-off saw & common dust collector
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	P011
Company Equipment ID:	Baghouse for bone saw & cut-off saws at P001 thru P008
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	P012
Company Equipment ID:	Sheet pultrusion 48-52 inch width continuous sheet
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	P013
Company Equipment ID:	Cold cleaning for each of the facility emissions units
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Closed molding Group

Emissions Unit ID:	P016
Company Equipment ID:	Compression mold press A
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	
Emissions Unit ID:	P017
Company Equipment ID:	Compression mold press B
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	
Emissions Unit ID:	P018
Company Equipment ID:	Compression mold press C
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	

Group Name: Mixer Group

Emissions Unit ID:	P009
Company Equipment ID:	Cowels Mixer for polyester politen resin
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	
Emissions Unit ID:	P014
Company Equipment ID:	Cowels Mixer for polyester politen resin
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Type:	
Emissions Unit ID:	P015
Company Equipment ID:	Cowels Mixer for polyester politen resin
Superseded Permit Number:	
General Permit Category and	Not Applicable
Type:	

Group Name: Pultrusion Machines Group I

Emissions Unit ID:	P001
Company Equipment ID:	Pultrusion unit with cut-off saw & common dust collector
Superseded Permit Number:	
General Permit Category and	Not Applicable
Type:	
Emissions Unit ID:	P002
Company Equipment ID:	Pultrusion unit with cut-off saw & common dust collector
Superseded Permit Number:	
General Permit Category and	Not Applicable
Type:	
Emissions Unit ID:	P003
Company Equipment ID:	Pultrusion unit with cut-off saw & common dust collector
Superseded Permit Number:	
General Permit Category and	Not Applicable
Type:	
Emissions Unit ID:	P004
Company Equipment ID:	Pultrusion unit with cut-off saw & common dust collector
Superseded Permit Number:	
General Permit Category and	Not Applicable
Type:	
Emissions Unit ID:	P005
Company Equipment ID:	Pultrusion unit with cut-off saw & common dust collector
Superseded Permit Number:	
General Permit Category and	Not Applicable
Type:	
Emissions Unit ID:	P006
Company Equipment ID:	Pultrusion unit with cut-off saw & common dust collector
Superseded Permit Number:	
General Permit Category and	Not Applicable
Type:	
Emissions Unit ID:	P008
Company Equipment ID:	Pultrusion unit with cut-off saw & common dust collector
Superseded Permit Number:	
General Permit Category and	Not Applicable
Type:	



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104325

Facility ID: 0204010405

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

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

2. Severability Clause

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

3. General Requirements

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



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

4. Monitoring and Related Record Keeping and Reporting Requirements

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



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

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

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

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

5. **Scheduled Maintenance/Malfunction Reporting**

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

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

6. **Compliance Requirements**

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

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

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



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

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

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



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

10. Applicability

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

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

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



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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

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

14. Public Disclosure

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

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

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

16. Fees

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

Draft Permit-to-Install

Permit Number: P0104325

Facility ID: 0204010405

Effective Date: To be entered upon final issuance

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

Draft Permit-to-Install

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B. Facility-Wide Terms and Conditions



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

2. For all fiberglass reinforced plastic operations, the permittee must keep all containers that store HAP-containing materials closed or covered, except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

[Authority for term: OAC rule 3745-31-05(D)]

3. Monitoring and/or Recordkeeping Requirements

- a) The permittee shall inspect daily when in operation all containers that store HAP-containing materials, and record the following information:
 - (1) the date and reason why any required inspection was not performed; and
 - (2) the date and all times when containers that store HAP-containing materials were not closed or covered, except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

[Authority for term: OAC rule 3745-31-05(D)]

4. Reporting Requirements

- a) The permittee must submit semiannual compliance reports:
 - (1) if there are no deviations from the work practice standards in 2 (i.e., all containers that store HAP-containing materials were closed or covered), a statement that there were no deviations from the work practice standards in 2 during the reporting period; and
 - (2) If there were deviations with the work practice standards in 2 (i.e., all containers that store HAP-containing materials were closed or covered), provide the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted by July 31 or January 31, respectively.

[Authority for term: OAC rule 3745-31-05(D)]



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C. Emissions Unit Terms and Conditions



1. P007, Pultrusion unit with cut-off saw & common dust collector

Operations, Property and/or Equipment Description:

Pultrusion machine No. 7 with cut-off saw & common dust collector, which is shared by all pultrusion machines and the dog bone saw.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)e, b)(1)h, b)(2)c, b)(2)d, c)(2), c)(3), d)(3), d)(4), d)(5), e)(2)c, e)(3), e)(4), f)(1)c, f)(1)d, f)(1)e and f)(1)g.

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 (Organic HAP) shall not exceed emissions standards as specified in 40 CFR 63.5805, Subpart WWWW. See b)(2)a.
b.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Work practice standards in Tables 4 of Subpart WWWW. See b)(2)a.
c.	40 CFR Part 63.1-15 (40 CFR 63.5925)	Table 15 to Subpart WWWW - Applicability of General Provisions, Subpart A. See b)(2)a.
d.	OAC rule 3745-21-07(G)(2)	Organic compounds (OC) emissions shall not exceed 8 lbs/hr or 40 lbs/day. See b)(2)b.
e.	OAC rule 3745-31-05(D)	<p>Volatile organic compounds (VOC) emissions shall not exceed 400 lbs/month and 2.4 tpy.</p> <p>The permittee shall use control techniques to reduce total VOC emissions by at least 60 percent by</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		weight as specified in b)(2)c. See b)(2)c, c)(2), c)(3), d)(3), d)(4), e)(2)c, e)(4), f)(1)c, f)(1)d and f)(1)e.
f.	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 1.07 lb/hr. The requirements of OAC rule 3745-17-11(B) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(D). See b)(1)h.
g.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as specified by the rule.
h.	OAC rule 3745-31-05(D)	PE shall not exceed 0.1 lb/hr and 0.5 tpy. See b)(2)d, d)(5), e)(3) and f)(1)g.

(2) Additional Terms and Conditions

- a. In accordance with 40 CFR 63.5800 and Table 2 of 40 CFR Part 63, Subpart WWWW, this facility is an existing area source that became a major source after the date of publication of this Subpart, and will be subject to the requirements of this Subpart after 3 years of becoming a major source, which is 3 years from the issuance date of this final permit.

At that time, this emissions unit will be subject to applicable requirements in b)(1)a, b)(1)b, b)(1)c, c)(1), d)(1), e)(1) and f)(1)a.

Should Subpart WWWW be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

- b. The OC emissions 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 emissions limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in b)(1)d, d)(2), e)(2)a, e)(2)b and f)(1)b shall be void.

- c. The permittee shall reduce total VOC emissions by at least 60 percent by weight. (These control techniques are taken from 40 CFR 63.5830, Subpart WWWW.)

To demonstrate compliance with this limit, the permittee shall design, install and operate a wet area enclosure and resin drip collection system meeting the criteria below:

The criteria for this pultrusion machine, with no radio frequency pre-mold heat unit, no direct die injection or preform injection system, are as follows:

- i. The enclosure must cover and enclose the open resin bath and the forming area in which reinforcements are pre-wet or wet-out and moving toward the die.
- ii. The surfaces of the enclosure must be closed except for openings to allow material to enter and exit the enclosure.
- iii. The enclosure must extend from the beginning of the resin bath to within 0.5 inches or less of the die entrance.
- iv. The enclosure can only be constructed high enough to clear the highest part of the pultrusion line that must be inside the enclosure.
- v. The total open area of the enclosure must not exceed 2 (two) times the cross sectional area of the puller window. All areas which are open need to be included in the total open area calculation with the exception of access panels, door and/or hatches that are part of the enclosure. The area which is displaced by entering reinforcement or exiting product is considered open. Areas covered by brush covers are considered closed.
- vi. Open areas for level control devices, monitoring devices, agitation shafts, and/or fill hoses must have no more than 1.0 inch clearance.
- vii. Any access panels, doors, and/or hatches that are part of the enclosure must close tightly to avoid vapor leakage. Damaged access panels, doors, and/or hatches that allow vapor leakage must be replaced.
- viii. The wet area enclosure shall not be removed from the pultrusion line and/or the access panels, doors, and/or hatches to the wet area enclosure must remain closed whenever resin is in the bath, except for the following periods of time:
 - (a) 30 minutes per any 8 hour shift;
 - (b) 45 minutes per any 12 hour shift;
 - (c) 90 minutes per any day, if the machine operates 24 hours in a day;
 - (d) The time restrictions do not apply if the open doors or panels do not cause the limit of two times the puller window area to be exceeded; and
 - (e) The facility may average the times that access panels, doors, and/or hatches are open across all operating lines. In this case, the average must not exceed the times shown above. All lines included in the average must have operated the entire time period being averaged.



- ix. No fans, blowers, and/or air lines shall be allowed within the enclosure. The enclosure must not be ventilated.
- x. Resin drip shall be captured within the enclosure and returned by gravity to the resin bath.
- d. The particulate emissions from this emissions unit shall be vented to a baghouse at all times the emissions unit is in operation.

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 total VOC emissions employed in resins applied to this pultrusion machine shall be restricted so as to not cause VOC emissions to exceed 400 lbs/month from this pultrusion machine.
- (3) The permittee shall operate this pultrusion machine with a wet area enclosure and resin drip collection system as to reduce total VOC emissions by at least 60 percent by weight. To meet this reduction, the permittee shall follow the criteria set forth in b)(2)c.

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 each emissions unit:
 - a. the company identification for each resin applied;
 - b. pounds of each resin applied;
 - c. the weight percent of available organic HAP (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:

$$OC \left(\frac{\text{lbs}}{\text{day}} \right) = (1 - 0.60) \times \sum_i^n \text{available organic HAP} \times EF$$

where:

i = pounds of available organic HAP in each resin applied;

n = number of resins applied; and

EF = each emissions factor.

EF = 0.04 lb of organic HAP emissions emitted / lb of available organic HAP in resin applied (US EPA's AP-42, Fifth Edition, Volume I Chapter 4: Evaporation Loss Sources, Section 4.4, Table 4.4-2. Emission Factors for Uncontrolled



Polyester Resin Production Fabrication Processes, February 2007, or the use of an EF with the written approval from Ohio EPA).

0.60 = OC emissions reduction limit, by weight (0.60 organic HAP emissions reduction limit, by weight, is achieved by meeting the requirements in b)(2)c of these terms and conditions).

- 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).

(3) The permittee shall maintain monthly records for each emissions unit:

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

$$\text{VOC} \left(\frac{\text{lbs}}{\text{month}} \right) = (1 - 0.60) \times \sum_i^n \text{available organic HAP} \times \text{EF}$$

where:

i = pounds of available organic HAP in each resin applied;

n = number of resins applied; and

EF = each emissions factor.

EF = 0.04 lb of organic HAP emissions emitted / lb of available organic HAP in resin applied (US EPA's AP-42, Fifth Edition, Volume I Chapter 4: Evaporation Loss Sources, Section 4.4, Table 4.4-2. Emission Factors for Uncontrolled Polyester Resin Production Fabrication Processes, February 2007, or the use of an EF with the written approval from Ohio EPA).

0.60 = VOC emissions reduction limit, by weight (0.60 organic HAP emissions reduction limit, by weight, is achieved by meeting the requirements in b)(2)c of these terms and conditions).

(4) The permittee shall inspect the wet area enclosure when there is resin present in the resin bath, and record the following information:

- a. the date and reason why any required inspection was not performed;
- b. the date and all times the enclosure was not in place over the resin bath and there was resin present in the resin bath;



- c. the date and all times the enclosure's access panels, doors, hatches or covers were open and there was resin present in the resin bath; and
 - d. the date and all times and cause(s) when the wet area enclosure and resin drip collection system did not meet each criterion in b)(2)c.
- (5) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) of the deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1 to 5 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of



this permit and may be incorporated into this permit by means of an administrative modification.

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 identify the following:
 - a. an identification of each day when the average hourly OC emissions exceeded 8 pound 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; and
 - c. an identification of each month when the VOC emissions exceeded 400 lbs/month pounds per month, and the actual VOC 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 quarterly deviation (excursion) reports that identify the following:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in Aa@ (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in Aa@ where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in Aa@ where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

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

- (4) The permittee must submit semiannual compliance reports:



- a. If there were no deviations with the emissions limit of reducing total VOC emissions by at least 60 weight percent, provide a statement that there were no deviations with this emissions limit, i.e., the total VOC emissions were reduced by at least 60 weight percent because each pultrusion machine met the criteria in section b)(2)c during the reporting period; and
- b. If there were deviations with the emissions limit of reducing total VOC emissions by at least 60 weight percent, provide the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted by July 31 or January 31, respectively.

- (5) The permittee shall submit annual reports which specify the total OC emissions from each emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

f) Testing Requirements

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

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 63.5780-5935)

b. Emission Limitation:

8 lbs OC/hr and 40 lbs OC/day

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping 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.

c. Emission Limitation:

Reduce total VOC emissions by at least 60 percent by weight



Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in d)(4) 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.

d. Emission Limitation:

400 lbs VOC/month

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in d)(3) 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.

e. Emission Limitation:

2.4 tpy VOC

Applicable Compliance Method:

Compliance shall be based upon record keeping specified in d)(3) of these terms and conditions and summing monthly VOC emissions (lbs/month) as recorded in d)(3) for the calendar year, and this total (lbs/year) shall be divided by 2000 pounds per ton.

f. Emission Limitation:

Particulate emissions shall not exceed 1.07 lb/hr.

Applicable Compliance Method:

If required, compliance shall be demonstrated by emission tests performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

g. Emission Limitation:

Particulate emissions shall not exceed 0.1 lb/hr and 0.5 tpy.

Applicable Compliance Method:

If required, compliance shall be demonstrated by emission tests performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

The permittee shall demonstrate compliance with the annual allowable PE limitation above by multiplying the maximum hourly controlled PE rate [(0.09



pounds/hr, uncontrolled) x (1 – 0.999, baghouse efficiency) = 0.00009 lb/hr, controlled emissions] by the maximum annual number of hours of operation (8760 hours/yr), and then dividing by 2000 lbs/ton.

h. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as specified by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

- (1) None.



2. **P011, Baghouse for bone saw & cut-off saws at P001 thru P008**

Operations, Property and/or Equipment Description:

- a) Dog bone saw, with common dust collector, which is shared by all pultrusion machines.

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

- (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

- a. None.

- (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

- a. b)(1)c, b)(2)a, d)(1), e)(1), and f)(1)b.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.92 lb/hr. The requirements of OAC rule 3745-17-11(B) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(D). See b)(1)c.
b..	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as specified by the rule.
c.	OAC rule 3745-31-05(D)	PE shall not exceed 0.2 lb/hr and 1 tpy. See b)(2)a, d)(1), e)(1) and f)(1)b.

- (2) Additional Terms and Conditions

- a. The particulate emissions from this emissions unit shall be vented to a baghouse at all times the emissions unit is in operation.



c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) of the deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1 to 5 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of



this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in Aa@ (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in Aa@ where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in Aa@ where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

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

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:

Particulate emissions shall not exceed 0.92 lb/hr.

Applicable Compliance Method:

If required, compliance shall be demonstrated by emission tests performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.
 - b. Emission Limitation:

Particulate emissions shall not exceed 0.2 lb/hr and 1 tpy.



Applicable Compliance Method:

If required, compliance shall be demonstrated by emission tests performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

The permittee shall demonstrate compliance with the annual allowable PE limitation above by multiplying the maximum hourly controlled PE rate [(2.33 pounds/hr, uncontrolled) x (1 – 0.999, baghouse efficiency) = 0.0023 lb/hr, controlled emissions] by the maximum annual number of hours of operation (8760 hours/yr), and then dividing by 2000 lbs/ton.

c. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as specified by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

- (1) None.



3. P012, Sheet pultrusion 48-52 inch width continuous sheet

Operations, Property and/or Equipment Description:

Sheet pultrusion machine No. 1

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)e, b)(2)c, c)(2), c)(3), d)(3), d)(4), e)(2)c, e)(3), f)(1)c, f)(1)d and f)(1)e.

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 (Organic HAP) shall not exceed emissions standards as specified in 40 CFR 63.5805, Subpart WWWW. See b)(2)a.
b.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Work practice standards in Tables 4 of Subpart WWWW. See b)(2)a.
c.	40 CFR Part 63.1-15 (40 CFR 63.5925)	Table 15 to Subpart WWWW - Applicability of General Provisions, Subpart A. See b)(2)a.
d.	OAC rule 3745-21-07(G)(2)	Organic compounds (OC) emissions shall not exceed 8 lbs/hr or 40 lbs/day. See b)(2)b.
e.	OAC rule 3745-31-05(D)	<p>Volatile organic compounds (VOC) emissions shall not exceed 1,217 lbs/month and 7.3 tpy</p> <p>The permittee shall use control techniques to reduce total VOC emissions by at least 60 percent by weight as specified in b)(2)c.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)c, c)(2), c)(3), d)(3), d)(4), e)(2)c, e)(3), f)(1)c, f)(1)d and f)(1)e.

(2) Additional Terms and Conditions

- a. In accordance with 40 CFR 63.5800 and Table 2 of 40 CFR Part 63, Subpart WWWW, this facility is an existing area source that became a major source after the date of publication of this Subpart, and will be subject to the requirements of this Subpart after 3 years of becoming a major source, which is 3 years from the issuance date of this final permit.

At that time, this emissions unit will be subject to applicable requirements in b)(1)a, b)(1)b, b)(1)c, c)(1), d)(1), e)(1) and f)(1)a.

Should Subpart WWWW be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

- b. The OC emissions 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 emissions limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in b)(1)d, d)(2), e)(2)a, e)(2)b and f)(1)b shall be void.

- c. The permittee shall reduce total VOC emissions by at least 60 percent by weight. (These control techniques are taken from 40 CFR 63.5830, Subpart WWWW.)

To demonstrate compliance with this limit, the permittee shall design, install and operate a wet area enclosure and resin drip collection system meeting the criteria below:

The criteria for this pultrusion machine, with no radio frequency pre-mold heat unit, no direct die injection or preform injection system, are as follows:

- i. The enclosure must cover and enclose the open resin bath and the forming area in which reinforcements are pre-wet or wet-out and moving toward the die.
- ii. The surfaces of the enclosure must be closed except for openings to allow material to enter and exit the enclosure.
- iii. The enclosure must extend from the beginning of the resin bath to within 0.5 inches or less of the die entrance.
- iv. The enclosure can only be constructed high enough to clear the highest part of the pultrusion line that must be inside the enclosure.



- v. The total open area of the enclosure must not exceed 2 (two) times the cross sectional area of the puller window. All areas which are open need to be included in the total open area calculation with the exception of access panels, door and/or hatches that are part of the enclosure. The area which is displaced by entering reinforcement or exiting product is considered open. Areas covered by brush covers are considered closed.
 - vi. Open areas for level control devices, monitoring devices, agitation shafts, and/or fill hoses must have no more than 1.0 inch clearance.
 - vii. Any access panels, doors, and/or hatches that are part of the enclosure must close tightly to avoid vapor leakage. Damaged access panels, doors, and/or hatches that allow vapor leakage must be replaced.
 - viii. The wet area enclosure shall not be removed from the pultrusion line and/or the access panels, doors, and/or hatches to the wet area enclosure must remain closed whenever resin is in the bath, except for the following periods of time:
 - (a) 30 minutes per any 8 hour shift;
 - (b) 45 minutes per any 12 hour shift;
 - (c) 90 minutes per any day, if the machine operates 24 hours in a day;
 - (d) The time restrictions do not apply if the open doors or panels do not cause the limit of two times the puller window area to be exceeded; and
 - (e) The facility may average the times that access panels, doors, and/or hatches are open across all operating lines. In this case, the average must not exceed the times shown above. All lines included in the average must have operated the entire time period being averaged.
 - ix. No fans, blowers, and/or air lines shall be allowed within the enclosure. The enclosure must not be ventilated.
 - x. Resin drip shall be captured within the enclosure and returned by gravity to the resin bath.
- 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 total VOC emissions employed in resins applied to this continuous sheet pultrusion machine shall be restricted so as to not cause VOC emissions to exceed 1,217 lbs/month from this pultrusion machine.



- (3) The permittee shall operate this pultrusion machine with a wet area enclosure and resin drip collection system as to reduce total VOC emissions by at least 60 percent by weight. To meet this reduction, the permittee shall follow the criteria set forth in b)(2)c.

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 each emissions unit:

- a. the company identification for each resin applied;
- b. pounds of each resin applied;
- c. the weight percent of available organic HAP (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:

$$OC \left(\frac{\text{lbs}}{\text{day}} \right) = (1 - 0.60) \times \sum_i^n \text{available organic HAP} \times EF$$

where:

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

EF = 0.04 lb of organic HAP emissions emitted / lb of available organic HAP in resin applied (US EPA's AP-42, Fifth Edition, Volume I Chapter 4: Evaporation Loss Sources, Section 4.4, Table 4.4-2. Emission Factors for Uncontrolled Polyester Resin Production Fabrication Processes, February 2007, or the use of an EF with the written approval from Ohio EPA).

0.60 = OC emissions reduction limit, by weight (0.60 organic HAP emissions reduction limit, by weight, is achieved by meeting the requirements in b)(2)c of these terms and conditions).

- 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).

- (3) The permittee shall maintain monthly records for each emissions unit:

- a. the company identification for each resin applied;
- b. pounds of each resin applied;



- c. the weight percent of available organic HAP (e.g., styrene and methyl methacrylate) for each resin applied;
- d. the total VOC emission rate for all resins applied, as calculated by the following equation, in pounds per month:

$$\text{VOC} \left(\frac{\text{lbs}}{\text{month}} \right) = (1 - 0.60) \times \sum_i^n \text{available organic HAP} \times \text{EF}$$

where:

i = pounds of available organic HAP in each resin applied;

n = number of resins applied; and

EF = each emissions factor.

EF = 0.04 lb of organic HAP emissions emitted / lb of available organic HAP in resin applied (US EPA's AP-42, Fifth Edition, Volume I Chapter 4: Evaporation Loss Sources, Section 4.4, Table 4.4-2. Emission Factors for Uncontrolled Polyester Resin Production Fabrication Processes, February 2007, or the use of an EF with the written approval from Ohio EPA).

0.60 = OC emissions reduction limit, by weight (0.60 organic HAP emissions reduction limit, by weight, is achieved by meeting the requirements in b)(2)c of these terms and conditions).

- (4) The permittee shall inspect the wet area enclosure when there is resin present in the resin bath, and record the following information:
 - a. the date and reason why any required inspection was not performed;
 - b. the date and all times the enclosure was not in place over the resin bath and there was resin present in the resin bath;
 - c. the date and all times the enclosure's access panels, doors, hatches or covers were open and there was resin present in the resin bath; and
 - d. the date and all times and cause(s) when the wet area enclosure and resin drip collection system did not meet each criterion in b)(2)c.
- 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 identify the following:
 - a. an identification of each day when the average hourly OC emissions exceeded 8 pound 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; and
- c. an identification of each month when the VOC emissions exceeded 1,217 pounds per month, and the actual VOC 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 must submit semiannual compliance reports:

- a. If there were no deviations with the emissions limit of reducing total VOC emissions by at least 60 weight percent, provide a statement that there were no deviations with this emissions limit, i.e., the total VOC emissions were reduced by at least 60 weight percent because each pultrusion machine met the criteria in section b)(2)c during the reporting period; and
- b. If there were deviations with the emissions limit of reducing total VOC emissions by at least 60 weight percent, provide the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted by July 31 or January 31, respectively.

(4) The permittee shall submit annual reports which specify the total OC emissions from each emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

f) Testing Requirements

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

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 63.5780-5935)

b. Emission Limitation:

8 lbs OC/hr and 40 lbs OC/day



Applicable Compliance Method:

Compliance shall be determined based upon the record keeping 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.

c. Emission Limitation:

Reduce total VOC emissions by at least 60 percent by weight

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in d)(4) 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.

d. Emission Limitation:

1,217 lbs VOC/month

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in d)(3) 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.

e. Emission Limitation:

7.3 tpy VOC

Applicable Compliance Method:

Compliance shall be based upon record keeping specified in d)(3) of these terms and conditions and summing monthly VOC emissions (lbs/month) as recorded in d)(3) for the calendar year, and this total (lbs/year) shall be divided by 2000 pounds per ton.

g) Miscellaneous Requirements

(1) None.



4. P013, Cold cleaning for each of the facility emissions units

Operations, Property and/or Equipment Description:

Facility-wide cleanup

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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 Tables 4 of Subpart WWWW. See b)(2)a.
b.	40 CFR Part 63.1-15 (40 CFR 63.5925)	Table 15 to Subpart WWWW - Applicability of General Provisions, Subpart A. See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)	Total organic compounds (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)b and c)(2).

(2) Additional Terms and Conditions

a. In accordance with 40 CFR 63.5800 and Table 2 of 40 CFR Part 63, Subpart WWWW, this facility is an existing area source that became a major source after the date of publication of this Subpart, and will be subject to the requirements of this Subpart after 3 years of becoming a major source, which is 3 years from the issuance date of this final permit.



At that time, this emissions unit will be subject to applicable requirements in b)(1)a, b)(1)b, c)(1), d)(1) and e)(1).

Should Subpart WWWW be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

- b. 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 for cleanup (e.g., acetone).

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 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 contain 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 to amount of OC emissions in 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 identify the following:
 - 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 which 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(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

- 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 based upon record keeping specified in d)(2) of these terms and conditions and summing monthly OC emissions (lbs/month) as recorded in d)(2) for the calendar year, and this total (lbs/year) shall be divided by 2000 pounds per ton.

g) Miscellaneous Requirements

- (1) None.



5. **Emissions Unit Group - Closed molding Group: P016, P017, P018,**

EU ID	Operations, Property and/or Equipment Description
P016	Compression molding machine A (Liquid compound molding)
P017	Compression molding machine B (Liquid compound molding)
P018	Compression molding machine C (Liquid compound molding)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c, b)(2)b, c)(2), d)(2), d)(3), e)(2), e)(3), f)(1)a and f)(1)b.

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 Tables 4 of Subpart WWWW. See b)(2)a.
b.	40 CFR Part 63.1-15 (40 CFR 63.5925)	Table 15 to Subpart WWWW - Applicability of General Provisions, Subpart A. See b)(2)a.
c.	OAC rule 3745-31-05(D)	<p>Volatile organic compounds (VOC) emissions shall not exceed 1,217 lbs/month and 7.3 tpy.</p> <p>See b)(2)b, c)(2), d)(2), d)(3), e)(2), e)(3), f)(1)a and f)(1)b.</p>

(2) Additional Terms and Conditions

a. In accordance with 40 CFR 63.5800 and Table 2 of 40 CFR Part 63, Subpart WWWW, this facility is an existing area source that became a major source after the date of publication of this Subpart, and will be subject to the requirements of



this Subpart after 3 years of becoming a major source, which is 3 years from the issuance date of this final permit.

At that time, this emissions unit will be subject to applicable requirements in b)(1)a, b)(1)b, c)(1), d)(1) and e)(1).

Should Subpart WWWW be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

b. Uncover, unwrap or expose only one charge per mold cycle per compression molding machine.

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 total VOC emissions employed in resins applied to each liquid compound molding machine shall be restricted so as to not cause VOC emissions to exceed 1,217 lbs/month from each molding machine.

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 monthly records for each emissions unit:

a. the company identification for each resin applied;

b. pounds of each resin applied;

c. the weight percent of available organic HAP (e.g., styrene and methyl methacrylate) for each resin applied;

d. the total VOC emission rate for all resins applied, as calculated by the following equation, in pounds per month:

$$\text{VOC} \left(\frac{\text{lbs}}{\text{month}} \right) = (1 - 0.60) \times \sum_i^n \text{available organic HAP} \times \text{EF}$$

where:

i = pounds of available organic HAP in each resin applied;

n = number of resins applied; and

EF = each emissions factor.

EF = 0.015 lb of organic HAP emissions emitted / lb of available organic HAP in resin applied (US EPA's AP-42, Fifth Edition, Volume I Chapter 4: Evaporation Loss Sources, Section 4.4, Table 4.4-2. Emission Factors for Uncontrolled



Polyester Resin Production Fabrication Processes, February 2007, the use other emissions factors, with written approval from Ohio EPA).

- (3) The permittee shall inspect the molding machine when in operation, and record the following information:
 - a. the date and reason why any required inspection was not performed; and
 - b. the date and all times when two or more charges were uncover, unwrap or expose per mold cycle per compression mold machine.

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 identify the following:
 - a. an identification of each month when the VOC emissions exceeded 1,217 pounds per month, and the actual VOC 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 must submit semiannual compliance reports:
 - a. if there are no deviations from the work practice standards in b)(2)b, a statement that there were no deviations from the work practice standards in b)(2)b during the reporting period; and
 - b. If there were deviations with the work practice standards in b)(2)b, provide the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted by July 31 or January 31, respectively.

- (4) The permittee shall submit annual reports which specify the total VOC emissions from each emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
1,217 lbs VOC/month



Applicable Compliance Method:

Compliance shall be determined based upon the record keeping 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.

b. Emission Limitation:

7.3 tpy VOC

Applicable Compliance Method:

Compliance shall be based upon record keeping specified in d)(2) of these terms and conditions and summing monthly VOC emissions (lbs/month) as recorded in d)(2) for the calendar year, and this total (lbs/year) shall be divided by 2000 pounds per ton.

g) Miscellaneous Requirements

(1) None.



6. Emissions Unit Group - Mixer Group: P009, P014, P015,

EU ID	Operations, Property and/or Equipment Description
P009	Mixer No. 1
P014	Mixer No. 2
P015	Mixer No. 3

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c, b)(1)f, b)(2)b, b)(2)c, b)(2)d, b)(2)e, c)(2), d)(2), d)(3), d)(4), e)(2), e)(3), e)(4), f)(1)a, f)(1)b and f)(1)d.

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 Tables 4 of Subpart WWWW. See b)(2)a.
b.	40 CFR Part 63.1-15 (40 CFR 63.5925)	Table 15 to Subpart WWWW - Applicability of General Provisions, Subpart A. See b)(2)a.
c.	OAC rule 3745-31-05(D)	Volatile organic compounds (VOC) emissions shall not exceed 1,217 lbs/month and 7.3 tpy See b)(2)b, b)(2)c, b)(2)d, c)(2), d)(3), d)(4), e)(3), e)(4), f)(1)a and f)(1)b.
d.	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 1.17 lb/hr. The requirements of OAC rule 3745-17-11(B) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(D). See b)(1)f.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as specified by the rule.
f.	OAC rule 3745-31-05(D)	PE shall not exceed 0.1 lb/hr and 0.5 tpy. See b)(2)e, d)(2), e)(2) and f)(1)d.

(2) Additional Terms and Conditions

- a. In accordance with 40 CFR 63.5800 and Table 2 of 40 CFR Part 63, Subpart WWWW, this facility is an existing area source that became a major source after the date of publication of this Subpart, and will be subject to the requirements of this Subpart after 3 years of becoming a major source, which is 3 years from the issuance date of this final permit.

At that time, this emissions unit will be subject to applicable requirements in b)(1)a, b)(1)b, c)(1), d)(1) and e)(1).

Should Subpart WWWW be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

- b. Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
- c. Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety.
- d. Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
- e. The particulate emissions from the emissions units listed above shall be vented to a fabric filter when one or more of the emissions units are in operation.

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 total VOC emissions employed in resins mixed in each mixer shall be restricted so as to not cause VOC emissions to exceed 1,217 lbs/month from each mixer.



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 record the date and all times the fabric filter was not in service to control PE when the emissions unit was in operation.
- (3) The permittee shall maintain monthly records for each emissions unit:
 - a. the company identification for each resin mix;
 - b. pounds of each resin mix produced;
 - c. the weight percent of available organic HAP (e.g., styrene and methyl methacrylate) for each resin mix produced;
 - d. the total OC emission rate for all resin mix produced, as calculated by the following equation, in pounds per month:

$$OC \left(\frac{\text{lbs}}{\text{month}} \right) = \sum_i^n \text{available organic HAP} \times EF$$

where:

i = pounds of available organic HAP in each resin mix produced;
n = number of resin mix produced; and
EF = each emissions factor.

EF = 0.005 lb of organic HAP emissions emitted / lb of available organic HAP input (US EPA's Hazardous Air Pollutant Emissions from the Production of Reinforced Plastic Composites - Background Information Document for Proposed Standard, May 2001, or the use other emissions factors, with written approval from Ohio EPA).

- (4) The permittee shall inspect the mixer when there is resin present in the mixing vessel, and record the following information:
 - a. the date and reason why any required inspection was not performed;
 - b. the date and all times the mixer cover was not closed over the mixing vessel, when actual mixing is occurring, except when adding materials or changing covers to the mixing vessel;
 - c. the date and all times the mixer vents were not closed over the mixing vessel, when actual mixing is occurring, except that venting is allowed during additions of materials, or as necessary prior to adding materials or opening the cover for safety; and



- d. the date and all times when visible gaps were present in the mixer cover, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation when the mixer cover was properly employed.

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 notify the Ohio EPA, Northeast District Office in writing of any daily record showing that the fabric filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Northeast District Office within 30 days after the event occurs.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. an identification of each day when the VOC emissions exceeded 1,217 pounds per month, and the actual VOC 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.

- (4) The permittee must submit semiannual compliance reports:
 - a. if there are no deviations from the work practice standards in b)(2)c, b)(2)d and b)(2)e, provide a statement that there were no deviations from each of the work practice standards in b)(2)c, b)(2)d and b)(2)e during the reporting period; and
 - b. If there were deviations with the work practice standards in b)(2)c, b)(2)d and b)(2)e, provide the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted by July 31 or January 31, respectively.

- (5) The permittee shall submit annual reports which specify the total OC emissions from each emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
1,217 lbs VOC/month



Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in d)(3) 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.

b. Emission Limitation:

7.3 tpy VOC

Applicable Compliance Method:

Compliance shall be based upon record keeping specified in d)(3) of these terms and conditions and summing monthly VOC emissions (lbs/month) as recorded in d)(3) for the calendar year, and this total (lbs/year) shall be divided by 2000 pounds per ton.

c. Emission Limitation:

Particulate emissions shall not exceed 1.17 lb/hr.

Applicable Compliance Method:

If required, compliance shall be demonstrated by emission tests performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

d. Emission Limitation:

Particulate emissions shall not exceed 0.1 lb/hr and 0.5 tpy.

Applicable Compliance Method:

If required, compliance shall be demonstrated by emission tests performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

The permittee shall demonstrate compliance with the annual allowable PE limitation above by multiplying the maximum hourly controlled PE rate [(3.08 pounds/hr, uncontrolled) x (1 – 0.99, filter efficiency) = 0.0308 lb/hr, controlled emissions] by the maximum annual number of hours of operation (8760 hours/yr), and then dividing by 2000 lbs/ton.

e. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as specified by the rule.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104325

Facility ID: 0204010405

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

- (1) None.



7. Emissions Unit Group - Pultrusion Machines Group I: P001, P002, P003, P004, P005, P006, P008,

EU ID Operations, Property and/or Equipment Description

P001	Pultrusion machine No. 1 with cut-off saw & common dust collector, which is shared by all pultrusion machines and the dog bone saw.
P002	Pultrusion machine No. 2 with cut-off saw & common dust collector, which is shared by all pultrusion machines and the dog bone saw.
P003	Pultrusion machine No. 3 with cut-off saw & common dust collector, which is shared by all pultrusion machines and the dog bone saw.
P004	Pultrusion machine No. 4 with cut-off saw & common dust collector, which is shared by all pultrusion machines and the dog bone saw.
P005	Pultrusion machine No. 5 with cut-off saw & common dust collector, which is shared by all pultrusion machines and the dog bone saw.
P006	Pultrusion machine No. 6 with cut-off saw & common dust collector, which is shared by all pultrusion machines and the dog bone saw.
P008	Pultrusion machine No. 8 with cut-off saw & common dust collector, which is shared by all pultrusion machines and the dog bone saw.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)e, b)(1)h, b)(2)c, b)(2)d, c)(2), c)(3), d)(3), d)(4), d)(5), e)(2)c, e)(3), e)(4), f(1)c, f(1)d, f(1)e and f(1)g.

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 (Organic HAP) shall not exceed emissions standards as specified in 40 CFR 63.5805, Subpart WWWW. See b)(2)a.
b.	40 CFR Part 63, Subpart WWWW	Work practice standards in Tables 4 of



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(40 CFR 63.5780-5935)	Subpart WWWW. See b)(2)a.
c.	40 CFR Part 63.1-15 (40 CFR 63.5925)	Table 15 to Subpart WWWW - Applicability of General Provisions, Subpart A. See b)(2)a.
d.	OAC rule 3745-21-07(G)(2)	Organic compounds (OC) emissions shall not exceed 8 lbs/hr or 40 lbs/day. See b)(2)b.
e.	OAC rule 3745-31-05(D)	<p>Volatile organic compounds (VOC) emissions shall not exceed 1,050 lbs/month and 6.3 tpy.</p> <p>The permittee shall use control techniques to reduce total VOC emissions by at least 60 percent by weight as specified in b)(2)c.</p> <p>See b)(2)c, c)(2), c)(3), d)(3), d)(4), e)(2)c, e(4), f(1)c, f(1)d and f(1)e.</p>
f.	OAC rule 3745-17-11(B)	<p>Particulate emissions (PE) shall not exceed 2.09 lbs/hr.</p> <p>The requirements of OAC rule 3745-17-11(B) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(D). See b)(1)h.</p>
g.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as specified by the rule. See b)(2)e.
h.	OAC rule 3745-31-05(D)	<p>PE shall not exceed 0.1 lb/hr and 0.5 tpy.</p> <p>See b)(2)d, d)(5), e)(3) and f(1)g.</p>

(2) Additional Terms and Conditions

- a. In accordance with 40 CFR 63.5800 and Table 2 of 40 CFR Part 63, Subpart WWWW, this facility is an existing area source that became a major source after the date of publication of this Subpart, and will be subject to the requirements of this Subpart after 3 years of becoming a major source, which is 3 years from the issuance date of this final permit.

At that time, this emissions unit will be subject to applicable requirements in b)(1)a, b)(1)b, b)(1)c, c)(1), d)(1), e)(1) and f(1)a.

Should Subpart WWWW be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.



- b. The OC emissions 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 emissions limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in b)(1)d, d)(2), e)(2)a, e)(2)b and f)(1)b shall be void.
- c. The permittee shall reduce total VOC emissions by at least 60 percent by weight. (These control techniques are taken from 40 CFR 63.5830, Subpart WWWW.)

To demonstrate compliance with this limit, the permittee shall design, install and operate a wet area enclosure and resin drip collection system meeting the criteria below:

The criteria for this pultrusion machine, with no radio frequency pre-mold heat unit, no direct die injection or preform injection system, are as follows:

- i. The enclosure must cover and enclose the open resin bath and the forming area in which reinforcements are pre-wet or wet-out and moving toward the die.
- ii. The surfaces of the enclosure must be closed except for openings to allow material to enter and exit the enclosure.
- iii. The enclosure must extend from the beginning of the resin bath to within 0.5 inches or less of the die entrance.
- iv. The enclosure can only be constructed high enough to clear the highest part of the pultrusion line that must be inside the enclosure.
- v. The total open area of the enclosure must not exceed 2 (two) times the cross sectional area of the puller window. All areas which are open need to be included in the total open area calculation with the exception of access panels, door and/or hatches that are part of the enclosure. The area which is displaced by entering reinforcement or exiting product is considered open. Areas covered by brush covers are considered closed.
- vi. Open areas for level control devices, monitoring devices, agitation shafts, and/or fill hoses must have no more than 1.0 inch clearance.
- vii. Any access panels, doors, and/or hatches that are part of the enclosure must close tightly to avoid vapor leakage. Damaged access panels, doors, and/or hatches that allow vapor leakage must be replaced.
- viii. The wet area enclosure shall not be removed from the pultrusion line and/or the access panels, doors, and/or hatches to the wet area enclosure must remain closed whenever resin is in the bath, except for the following periods of time:
 - (a) 30 minutes per any 8 hour shift;



- (b) 45 minutes per any 12 hour shift;
 - (c) 90 minutes per any day, if the machine operates 24 hours in a day;
 - (d) The time restrictions do not apply if the open doors or panels do not cause the limit of two times the puller window area to be exceeded; and
 - (e) The facility may average the times that access panels, doors, and/or hatches are open across all operating lines. In this case, the average must not exceed the times shown above. All lines included in the average must have operated the entire time period being averaged.
 - ix. No fans, blowers, and/or air lines shall be allowed within the enclosure. The enclosure must not be ventilated.
 - x. Resin drip shall be captured within the enclosure and returned by gravity to the resin bath.
 - d. The particulate emissions from the emissions units listed above shall be vented to a baghouse when one or more of the emissions units are in operation.
- 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 total VOC emissions employed in resins applied to each pultrusion machine shall be restricted so as to not cause VOC emissions to exceed 1,050 lbs/month from each pultrusion machine.
 - (3) The permittee shall operate this pultrusion machine with a wet area enclosure and resin drip collection system as to reduce total VOC emissions by at least 60 percent by weight. To meet this reduction, the permittee shall follow the criteria set forth in b)(2)c.
- 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 each emissions unit:
 - a. the company identification for each resin applied;
 - b. pounds of each resin applied;
 - c. the weight percent of available organic HAP (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:

$$OC \left(\frac{\text{lbs}}{\text{day}} \right) = (1 - 0.60) \times \sum_i^n \text{available organic HAP} \times EF$$

where:

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

EF = 0.04 lb of organic HAP emissions emitted / lb of available organic HAP in resin applied (US EPA's AP-42, Fifth Edition, Volume I Chapter 4: Evaporation Loss Sources, Section 4.4, Table 4.4-2. Emission Factors for Uncontrolled Polyester Resin Production Fabrication Processes, February 2007, or the use of an EF with the written approval from Ohio EPA).

0.60 = OC emissions reduction limit, by weight (0.60 organic HAP emissions reduction limit, by weight, is achieved by meeting the requirements in b)(2)c of these terms and conditions).

- 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).

(3) The permittee shall maintain monthly records for each emissions unit:

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

$$VOC \left(\frac{\text{lbs}}{\text{month}} \right) = (1 - 0.60) \times \sum_i^n \text{available organic HAP} \times EF$$

where:

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

EF = 0.04 lb of organic HAP emissions emitted / lb of available organic HAP in resin applied (US EPA's AP-42, Fifth Edition, Volume I Chapter 4: Evaporation Loss Sources, Section 4.4, Table 4.4-2. Emission Factors for Uncontrolled



Polyester Resin Production Fabrication Processes, February 2007, or the use of an EF with the written approval from Ohio EPA).

0.60 = VOC emissions reduction limit, by weight (0.60 organic HAP emissions reduction limit, by weight, is achieved by meeting the requirements in b)(2)c of these terms and conditions.).

- (4) The permittee shall inspect the wet area enclosure when there is resin present in the resin bath, and record the following information:
- a. the date and reason why any required inspection was not performed;
 - b. the date and all times the enclosure was not in place over the resin bath and there was resin present in the resin bath;
 - c. the date and all times the enclosure's access panels, doors, hatches or covers were open and there was resin present in the resin bath; and
 - d. the date and all times and cause(s) when the wet area enclosure and resin drip collection system did not meet each criterion in b)(2)c.
- (5) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) of the deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.



Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1 to 5 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

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 identify the following:
 - a. an identification of each day when the average hourly OC emissions exceeded 8 pound 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; and
 - c. an identification of each month when the VOC emissions exceeded 1,050 lbs/month pounds per month, and the actual VOC 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 quarterly deviation (excursion) reports that identify the following:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;



- c. each incident of deviation described in Aa@ (above) where a prompt investigation was not conducted;
- d. each incident of deviation described in Aa@ where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- e. each incident of deviation described in Aa@ where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

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

(4) The permittee must submit semiannual compliance reports:

- a. If there were no deviations with the emissions limit of reducing total VOC emissions by at least 60 weight percent, provide a statement that there were no deviations with this emissions limit, i.e., the total VOC emissions were reduced by at least 60 weight percent because each pultrusion machine met the criteria in section b)(2)c during the reporting period; and
- b. If there were deviations with the emissions limit of reducing total VOC emissions by at least 60 weight percent, provide the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted by July 31 or January 31, respectively.

(5) The permittee shall submit annual reports which specify the total OC emissions from each emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

f) Testing Requirements

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

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 63.5780-5935)



b. Emission Limitation:

8 lbs OC/hr and 40 lbs OC/day

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping 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.

c. Emission Limitation:

Reduce total VOC emissions by at least 60 percent by weight

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in d)(4) 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.

d. Emission Limitation:

1,050 lbs VOC/month

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in d)(3) 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.

e. Emission Limitation:

6.3 tpy VOC

Applicable Compliance Method:

Compliance shall be based upon record keeping specified in d)(3) of these terms and conditions and summing monthly VOC emissions (lbs/month) as recorded in d)(3) for the calendar year, and this total (lbs/year) shall be divided by 2000 pounds per ton.

f. Emission Limitation:

Particulate emissions shall not exceed 2.09 lb/hr.



Applicable Compliance Method:

If required, compliance shall be demonstrated by emission tests performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

g. Emission Limitation:

Particulate emissions shall not exceed 0.1 lb/hr and 0.5 tpy.

Applicable Compliance Method:

If required, compliance shall be demonstrated by emission tests performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

The permittee shall demonstrate compliance with the annual allowable PE limitation above by multiplying the maximum hourly controlled PE rate [(0.73 pounds/hr, uncontrolled) x (1 - 0.99, baghouse efficiency) = 0.0073 lb/hr, controlled emissions] by the maximum annual number of hours of operation (8760 hours/yr), and then dividing by 2000 lbs/ton.

h. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as specified by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

- (1) None.