



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

6/2/2010

Certified Mail

Ms. Emily Langenderfer
Comfort Line Ltd.
5500 Enterprise Blvd
Toledo, OH 43612

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTA
Facility ID: 0448011664
Permit Number: P0105966
Permit Type: Administrative Modification
County: Lucas

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
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, Toledo Blade. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. 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 Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604

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 Toledo Department of Environmental Services at (419)936-3015.

Sincerely,


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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
TDES; Michigan; Indiana; Canada

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
Comfort Line Ltd.

Issue Date: 6/2/2010

Permit Number: P0105966

Permit Type: Administrative Modification

Permit Description: Administrative Modification is to add terms for OAC rule 3745-21-25. In addition, the company requested (volunteered) to add BAT terms for emissions less than 10 tons.

Facility ID: 0448011664

Facility Location: Comfort Line Ltd.
5500 Enterprise Blvd,
Toledo, OH 43612

Facility Description: All Other Plastics Product Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Mary Lehman-Schmidt at Toledo Department of Environmental Services, 348 South Erie Street or (419)936-3015. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

This administrative permit modification to PTI 04-01457 dated December 5, 2006 is to add the terms for OAC rule 3745-21-25 to emission units P001-P006 per the request of the facility. These emission units (EU) are the mixer (P001) and pultrusion units (P002-P006) at the facility. The rule became effective on December 14, 2009. Also, due to the recent court decision regarding S.B. 265 and the particulate emissions (PE) being less than 10 tons per year for these emission units, the facility requested BAT limits for these emissions. Per the memo dated February 19, 2010, the dual language for BAT limits of emissions below 10 tons per year was added to this PTI. Lastly, the facility requested the basis of the toxic emissions impact evaluation be modified. Since the facility is now subject to 40 CFR Part 63 Subpart WWWW, compliance with the evaluation can be based on compliance with this MACT. Previously, the evaluation was based on the method described in an Ohio EPA document entitled "Option A – Review of New Sources of Air Toxic Emissions."

3. Facility Emissions and Attainment Status:

This facility is a major source of HAP emissions. All other criteria pollutants are minor.

Pollutant	Significant Net Emission Increase Levels	Attainment Status
PM2.5	250 TPY	attainment
PM10	250 TPY	attainment
SO2	250 TPY	attainment
VOC	250 TPY	attainment
NOx	250 TPY	attainment
CO	250 TPY	attainment

4. Applicable Rules/Regulations

OAC rule 3745-31-05(A)(3)	BAT applies to VOC and PE emissions. PE emissions are less than 10 tons per year, so BAT will only apply until S.B. 265 approved for the SIP.
OAC rule 3745-31-05(A)(3)(a)(ii)	This will only apply after S.B. 265 is approved for SIP. Less than 10 tons per year is based on use of fabric filter.
OAC rule 3745-31-05(D) 40 CFR Part 63, Subpart WWWW	Federally enforceable limit on plant-wide VOC emissions per year. Work practice standards for mixing, clean up solvents, and storage of HAP-containing materials. Sixty per cent reduction in HAP emissions from pultrusion.
OAC rule 3745-17-07(A)	Visible emissions shall not exceed 20% opacity, unless otherwise specified by the rule.



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0105966
Facility ID: 0448011664

OAC rule 3745-17-11(B)	PE shall not exceed 2.58 pounds per hour. Less restrictive than BAT but will apply when S.B. 265 approved for SIP.
OAC rule 3745-21-07(G)(2)	Photochemically reactive OC emissions shall not exceed 40 pounds per day. Will cease to be effective when revisions approved for SIP.
OAC Rule 3745-21-25	Work practice standards for mixing, clean up solvents, and storage of VOC-containing materials. Sixty per cent reduction in VOC emissions from pultrusion.
OAC rule 3745-114	Toxic emissions impact evaluation satisfied by requirements of 40 CFR Part 63 Subpart WWWW.

5. Source Emissions:

Particulate Emissions

P001 Mixer

Mix Rate	1000 lbs/hr
Dry Solids Content	62.50% by weight
Emissions Factor (AP-42 Table 6.4-1 1/95)	0.010 lb PE/lb solids
Uncontrolled PM	6.25 lbs/hr
Controlled PM (99% control)	0.07 lb/hr
Annual PM (PTE@8760 hrs/yr)	0.31 ton/yr

The mix rate and dry solids content was provided by the facility in their application for PTI 04-01457 dated December 5, 2006. There have been no changes in process or equipment, so this data is still valid. The emission factor is based on dispersion of solids in paint manufacturing, a process similar to this mixing. The control is provided by a fabric filter system and the application claimed 99% control efficiency. The uncontrolled PM was determined by:

$$PM_{uncontrolled} = (\text{Mix rate})(\% \text{ dry solids content})(\text{Emission factor}) = (1000 \text{ lbs/hr})(62.5\%)(0.010 \text{ lb PE/lb solids}) = 6.25 \text{ lbs PE/hr}$$

$$PM_{controlled} = (PM_{uncontrolled})(1 - \% \text{ control efficiency}) = (6.25 \text{ lbs PE/hr})(1 - 0.99) = 0.07 \text{ lb PE/hr}$$

$$\text{Annual } PM_{controlled} = (PM_{controlled})(8760 \text{ hrs/yr}) / (2000 \text{ lbs/ton}) = (0.07 \text{ lb PE/hr})(8760 \text{ hrs/yr}) / (2000 \text{ lbs/ton}) = 0.31 \text{ ton PE/yr}$$

P002-P006 Pultrusion Lines

	P002-P004	P005-P006
Maximum Linear foot of product per minute	6.0	8.0
Saw cut speed	0.500 cut/min	0.667 cut/min
Density of product	12 lbs/ft ³	12 lbs/ft ³
Maximum profile area of product	0.0625 ft ²	0.0625 ft ²
Maximum saw blade width	0.1875 in.	0.1875 in.
Weight product removed per cut	0.012 lb/cut	0.012 lb/cut
Uncontrolled PM	0.36 lb/hr	0.48 lb/hr
Controlled PM (99% control)	0.004 lb/hr	0.005 lb/hr



Annual PM (PTE@8760 hrs/yr)	0.02 ton/yr	0.03 ton/yr
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The maximum linear foot of product per minute, saw cut speed, density of product, profile area of product, saw blade width and volume removed per cut was provided by the facility in their application for PTI 04-01457 dated December 5, 2006. There have been no changes in process or equipment, so this data is still valid. The saw cut speed is based on maximum linear foot of product produced per minute on the pultrusion line and cutting the final product into 12 foot lengths. The volume of product removed per cut is based on the saw blade width and the maximum profile area of the product. The control is provided by a fabric filter system that claims 99% control efficiency. The PM is determined by the following equations:

$$\begin{aligned} \text{(Saw cut speed)} &= (\text{linear foot of product per min})(1 \text{ cut per } 12 \text{ linear foot}) \\ &= (6.0 \text{ linear foot/min})(1 \text{ cut}/12 \text{ linear foot}) = 0.500 \text{ cut/min} \end{aligned}$$

$$\begin{aligned} \text{Weight}_{\text{cut}} &= (\text{density of product})(\text{profile area})(\text{width of blade}) \\ &= (12.0 \text{ lbs/ft}^3)(0.0625 \text{ ft}^2)(0.1875 \text{ in.}/12 \text{ in/ft}) = 0.012 \text{ lbs/cut} \end{aligned}$$

$$\begin{aligned} \text{PM}_{\text{uncontrolled}} &= (\text{saw cut speed})(\text{weight}_{\text{cut}})(60 \text{ min/hr}) = (0.500 \text{ cut/min})(0.012 \text{ lbs/cut})(60 \text{ min/hr}) \\ &= 0.36 \text{ lbs PM/hr} \end{aligned}$$

$$\text{PM}_{\text{controlled}} = (\text{PM}_{\text{uncontrolled}})(1 - \% \text{ control efficiency}) = (0.36 \text{ lbs PM/hr})(1-0.99) = 0.004 \text{ lbs PM/hr}$$

$$\begin{aligned} \text{Annual PM}_{\text{controlled}} &= (\text{PM}_{\text{controlled}})(8760 \text{ hrs/yr})/(2000 \text{ lbs/ton}) = (0.004 \text{ lb PE/hr})(8760 \text{ hrs/yr})/(2000 \text{ lbs/ton}) \\ &= 0.02 \text{ ton PE/yr} \end{aligned}$$

6. Conclusion:

This modification adds terms to comply with OAC rule 3745-21-25 which recently became effective in December 2009. The terms apply to the mixing and pultrusion functions at this facility. They do not add any new requirements since they mirror the requirements for 40 CFR Part 63 Subpart WWWW and the emissions controlled are both VOCs and HAPs. The BAT requirements were added for particulate emissions but will cease to be effective when S.B. 265 has been approved for the SIP. Per the request of the facility, the toxic emissions impact evaluation was modified to show compliance with the evaluation by showing compliance with the terms of 40 CFR Part 63 Subpart WWWW. It is recommended this modification be approved.

7. Please provide additional notes or comments as necessary:

Relevant terms for OAC rule 3745-21-25

The affected operations at this facility are pultrusion, mixing, cleaning of equipment used in reinforced plastic composites manufacture and VOC-containing materials storage. The cleaning of equipment and VOC-containing materials storage are common to all the EUs at this facility. The rule addresses these operations in Table 1: Work practice standards. Table 1 requires that a cleaning solvent not have a VOC content greater than 0.42 pound VOC per gallon of solvent. The facility already has a more restrictive term which only allows non-VOC containing cleanup solvents, such as VOC-exempt acetone. The VOC-containing materials storage operation requires containers that store VOC-containing materials to be closed or covered except during the addition or removal of materials. The MACT rule 40 CFR Part 63 Subpart WWWW, has the same container requirement regarding HAPs. Since the only HAP (styrene) in



these EUs is also a VOC and this is the only VOC for these EUs, both of these rules have essentially the same requirement.

The requirements for mixing in OAC rule 3745-21-25 is also found in Table 1: Work Practice Standards. The work practices standards for this rule have the same requirements as 40 CFR Part 63 Subpart WWWW. They include: (1) using mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1.0 inch are permissible around mixer shafts and any required instrumentation; (2) 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. Vents routed to a ninety-five per cent efficient control device are exempt from this requirement; and (3) Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

The requirements of OAC rule 3745-21-25 for pultrusion at this facility can be found in Table 2. The facility has a facility-wide restriction on VOC emissions of 90 tons per rolling, 12-month period. They also produce parts that are less than one thousand reinforcements or the glass equivalent of one thousand ends of one hundred thirteen yield roving; and have a cross sectional area of less than sixty square inches. Taking into account these two parameters, the facility is required to reduce total VOC emissions by at least sixty per cent by weight. The requirements of 40 CFR Part 63 Subpart WWWW reduce total organic HAPs by at least sixty per cent by weight. As mentioned previously, the VOC emissions in these EUs are also HAP emissions. Therefore, the requirement of OAC rule 3745-21-25 is equivalent to the current requirement imposed by 40 CFR Part 63 Subpart WWWW.

BAT limits for particulate emissions

The particulate emissions (PE) in these emission units are less than 10 tons per year due to the use of a fabric filter system. The PTI modification 04-01457 dated 12/6/2006 added the Ohio EPA recommended language for S.B. 265 and removed BAT requirements for the PE. With the recent court decision, the facility has requested reinstating the BAT requirements in this administrative modification. The BAT requirements include a short term limit in pounds per hour as well as a ton per year limit. These limits are based on the controlled potential to emit and use the information provided in the application for PTI modification 04-01457 dated 12/6/2006. No process or equipment changes have been made since this information was provided. Per the Ohio EPA memo dated 2/19/2010, dual language was used for the PE limits. The BAT limits for PE will cease to be effective when S.B. 265 language is approved for the SIP.

Toxic emissions impact evaluation

The facility has requested the toxic emissions impact evaluation be modified. Previously, compliance with this evaluation was based on an Ohio EPA document entitled "Option A – Review of New Sources of Air Toxic Emissions." Styrene is the toxic material of interest at this facility, and calculations show that the styrene emissions are much less than the maximum acceptable ground level concentration. When 40 CFR Part 63 Subpart WWWW became effective, it would also satisfy the requirements of the toxic emissions impact evaluation since styrene emissions are controlled by the requirements of this MACT. The language in the permit for these EUs has been updated to show compliance with the toxic emissions impact evaluation is satisfied by 40 CFR Part 63 Subpart WWWW.

Also, PTI 04-01457 dated 12/6/2006 had added seven new pultrusion lines (P007-P013) as emission units. These emission units were never constructed. These emission units were removed from this modification.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0105966
Facility ID: 0448011664

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	0.43 (-0.45)
OC	26.14(-90.0)
VOC*	52.93(-37.07)
HAP**	52.93(-37.07)

(decrease in emissions due to removal of EUs never installed)

* VOCs have a facility-wide limit of 90 tons per year.

** All VOC emissions at this facility are also HAPs



DRAFT

**Division of Air Pollution Control
Permit-to-Install
for
Comfort Line Ltd.**

Facility ID: 0448011664
Permit Number: P0105966
Permit Type: Administrative Modification
Issued: 6/2/2010
Effective: To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Comfort Line Ltd.

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Authorization

Facility ID: 0448011664

Facility Description: Manufacture of extruded plastics

Application Number(s): M0000716, M0000728, M0000729

Permit Number: P0105966

Permit Description: Administrative Modification is to add terms for OAC rule 3745-21-25. In addition, the company requested (volunteered) to add BAT terms for emissions less than 10 tons.

Permit Type: Administrative Modification

Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 6/2/2010

Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Comfort Line Ltd.
5500 Enterprise Blvd
Toledo, OH 43612

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:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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: P0105966
Permit Description: Administrative Modification is to add terms for OAC rule 3745-21-25. In addition, the company requested (volunteered) to add BAT terms for emissions less than 10 tons.

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

- Emissions Unit ID: K001**
Company Equipment ID: Main Paint Line
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID: K002**
Company Equipment ID: Custom Paint Line
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P001**
Company Equipment ID: Mixer 1
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Group Name: Pultrusion Streams A-E

Emissions Unit ID:	P002
Company Equipment ID:	Pultrusion Stream A
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	Pultrusion Stream B
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	Pultrusion Stream C
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	Pultrusion Stream D
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	Pultrusion Stream E
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

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 Toledo Department of Environmental Services.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Toledo Department of Environmental Services. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Toledo Department of Environmental Services every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

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

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Toledo Department of Environmental Services.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Toledo Department of Environmental Services. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

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

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown 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 reporting requirements identified in this permit 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 deviation report, 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.

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- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

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

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

16. Fees

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

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

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.

B. Facility-Wide Terms and Conditions

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1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. The combined emissions of Volatile Organic Compounds (VOC) from all emission units at this facility shall not exceed 90.00 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The combined emissions of VOC shall include the VOC emissions from the following emission units: K001, K002, P001, P002, P003, P004, P005, P006, and P014.

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

Months	Maximum Allowable Cumulative Emissions of VOC (tons)
1	7.5
1-2	15.0
1-3	22.5
1-4	30.0
1-5	37.5
1-6	45.0
1-7	52.5
1-8	60.0
1-9	67.5
1-10	75.0
1-11	82.5
1-12	90.0

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

3. The permittee shall maintain monthly records of the following information:
 - a. During the first 12 calendar months of operation following the issuance of this permit, the cumulative VOC emissions, calculated by adding the current month's VOC emissions from all emissions units in the facility to the VOC emissions from each calendar month since the issuance of the permit from all emissions units in the facility, and
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the VOC emissions, calculated by adding the current month's VOC emissions from all emission units at this facility to the VOC emissions for the preceding eleven calendar months from all emission units at this facility.

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions, of this permit.

C. Emissions Unit Terms and Conditions

1. P001, Mixer 1

Operations, Property and/or Equipment Description:

Resin Blending Mixer 1.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions, excluding emissions from non-VOC, non-photochemically reactive clean-up materials, shall not exceed 3.75 pounds per hour, 90.00 pounds per day, and 16.43 tons per year. See b)(2)a.</p> <p>OC emissions from clean-up materials from all mixing and pultrusion lines at the facility shall not exceed 2.18 tons per month and 26.14 tons per year. See b)(2)d.</p>
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate emissions (PE) shall not exceed 0.07 pound per hour and 0.31 ton per year. See b)(2)e.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06	Particulate Emissions (PE) shall be less than 10.0 tons per year. See b)(2)b.
d.	OAC rule 3745-31-05(D)	See 2. through 4. of Section B.
e.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935)</p> <p>[In accordance with 40 CFR 63.5805(b), this emissions unit is a mixing operation at an existing area source that became a major source after the date of publication of this subpart subject to the emissions limitations/control measures</p>	<p>Work practice standards must be followed in accordance with the applicable portions of 40 CFR 63.5805 and Table 4.</p> <p>See c)(3).</p>

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	specified in this section.]	
f.	40 CFR Part 63, Subpart A	See b)(2)c.
g.	OAC rule 3745-17-07(A)	Visible Emissions (VE) from this emission unit shall not exceed 20% opacity as a 6-minute average.
h.	OAC rule 3745-17-11(B)	PE shall not exceed 2.58 pounds per hour.
i.	OAC rule 3745-21-07(G)(2)	See b)(2)f.
j.	OAC Rule 3745-21-25	Work practice standards must be followed in accordance with the applicable portions of Table 1.
k.	OAC rule 3745-114	See b)(2)g.

(2) Additional Terms and Conditions

- a. The VOC emissions from the mixing operation consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
- b. The following terms and conditions apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
 - i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this source since the controlled annual emissions rate for PE is less than 10 tons/yr taking into account the use of a fabric filter system with a minimum control efficiency of 99% by weight.
- c. Table 15 to 40 CFR Part 63 Subpart WWWW shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- d. These emission limitations consist of the clean-up emissions from all the mixing and pultrusion lines which include the following emission units: P001, P002, P003, P004, P005, and P006.
- e. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirements to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

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- f. The emissions from the clean-up operation shall be exempt from this requirement due to the use of a non-photochemically reactive material.

This restriction shall cease to be effective and federally enforceable on the date the U.S EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitation, monitoring, record keeping, and reporting requirements related to this restriction in c)(2), d)(3), and e)(1) shall be void.

- g. The toxic emissions from this emission unit are subject to 40 CFR Part 63 Subpart WWWW, and therefore satisfy the requirements for a toxic impact evaluation.

c) Operational Restrictions

- (1) The permittee shall operate the particulate control, fabric filter system whenever this emissions unit is in operation.
- (2) The permittee shall use only non-HAP, non-VOC, non-photochemically reactive material (eg. acetone) for cleanup of this emission unit.
- (3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart WWWW, including the following sections by December 5, 2009:

a.	63.5805(b)	Table 4 –work practice standards
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- (4) The permittee shall comply with the applicable restrictions required under OAC rule 3745-21-25, including Table 1 – Work practice standards.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission

incident under item d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (2) The permittee shall collect and record the following information for each day for this emission unit:
- a. the company identification of each resin employed;
 - b. the weight of each resin employed in pounds;
 - c. the VOC content of each resin employed (e.g. styrene), in percent by weight;
 - d. the individual HAP and total HAP content of each resin employed, in pounds per gallon;
 - e. the total VOC emission rate for all resin employed (eg. styrene), calculated as required in f)(1)b., in pounds per day;
 - f. the actual number of hours that the emissions unit was in operation;
 - g. the average, hourly VOC emission rate for all resins employed (e.g. styrene), calculated by e./f., in average, pounds per hour; and
 - h. the daily and hourly (average) VOC emissions rate are to be calculated by no later than the first week of the following month from which information was collected for this emission unit.
- (3) The permittee shall collect and record the following information for the month (total plantwide), except for cleanup on coating lines:
- a. the company identification for each cleanup material employed;
 - b. an identification of whether or not each cleanup material employed is photochemically reactive, a VOC, or contains HAP;
 - c. the volume of each cleanup material applied in gallons;
 - d. the OC content of each cleanup material applied in pounds per gallon;
 - e. the total OC emissions rate for all cleanup material, in pounds per month, calculated as required in f)(1)d.;
 - f. the combined total emission rate from all emission units for all cleanup material, except the coating lines, at this facility, in pounds per month (all used is assumed to evaporate);

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g. the monthly OC emission rate is calculated by no later than the first week of the following month from which the information was collected for this emissions unit.

(4) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart WWWW, including the following sections by December 5, 2009:

a.	63.5805(b)	Table 4 – work practice standards
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(5) The permittee shall comply with the applicable monitoring and record keeping requirements required under paragraphs (O) and (P) of OAC rule 3745-21-25, including the following:

a. A certified statement that operations are in compliance with the work practice standards specified in table 1 of this rule, as applicable.

e) Reporting Requirements

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

- a. the identification of each day during which the VOC emissions, excluding cleanup materials, from this emission unit exceeded 3.75 pounds per hour or 16.43 tons per year, and the actual VOC emissions for each such time period;
- b. the identification of each day during which the VOC emissions, excluding cleanup materials, from this emission unit exceeded 90.00 pounds per day, and the actual VOC emissions for each such day;
- c. an identification of each month during which the combined OC emissions, from cleanup materials from all emission units located at this facility other than the coating lines, exceeded 2.18 tons per month facility wide, and the actual OC emissions for each such month;
- d. an identification of each month during which a HAP, a VOC, or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;
- e. an identification of each day during which an inspection was not performed by the required frequency;
- f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented; and
- g. if no deviations, report no deviations.

(2) The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the particulate control filter was not in service when the emission unit was in operation. The notification shall include a copy of such record and

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shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.

- (3) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (4) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart WWWW, per the following sections with the first report due by January 31, 2010:

a.	63.5910(a)	Table 14 – semi-annual compliance report
b.	63.5910 (b)	Submittal date of reports
c.	63.5910 (c)	Contents of compliance reports
d.	63.5910(f)	Submission of deviation reports
e.	63.5910(g)	Title V monitoring report allowance

- (5) The permittee shall submit a semiannual compliance report that contains the information and submitted in the time frame specified in paragraph (Q) of OAC rule 3745-21-25. If the semiannual compliance report required by the Title V permit includes all the information required for this rule, the report for the Title V permit shall be deemed to satisfy any obligation for reporting for this rule.
- (6) The owner or operator shall report if the facility exceeds the one hundred tons of VOC per year emissions threshold if that exceedance would make the facility subject to paragraph (D)(3) of OAC rule 3745-21-25.
- (7) If the permittee has an affected operation that has an initial startup date before the effective date of OAC rule 3745-21-25, the permittee shall notify the appropriate Ohio environmental protection agency or local air agency in writing that such operation is subject to this rule. The notification, which shall be submitted not later than sixty days after the effective date of this rule, shall provide the following information:
 - a. Name and address of the owner or operator
 - b. Address (i.e., physical location) of the facility;
 - c. Equipment description and Ohio EPA application number of the affected operation;
 - d. Identification of the applicable requirements, the means of compliance, and the compliance date for the effective operation under this rule; and

- e. Regarding a permit for the affected operation, whichever of the following is applicable:
 - i. Submission of an application for an operating permit, a permit modification, or an operating permit renewal in accordance with rule 3745-31-02 of the administrative code; or
 - ii. Submission of a statement of intent to submit an application for a Title V permit or modification of a Title V permit in accordance with rule 3745-77-02 or 3745-77-06 of the administrative code, respectively.

f) Testing Requirements

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

- a. Emission Limitation:

3.75 pounds of VOC per hour, excluding emission from cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by dividing the daily VOC emissions, as calculated in f)(1)b., by the number of actual number of hours that the emissions unit was in operation, as recorded in d)(2)f.

If required, the permittee shall demonstrate compliance with this emission limitation through testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents.

The permittee shall also determine the capture efficiency using Methods 204A through 204F, as appropriate, of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- b. Emission Limitation:

90.0 pounds of VOC per day, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be determined in accordance with the record keeping requirements specified in d)(2)b. and d)(2)c.

Compliance shall be determined based upon the following equation:

$$EM(OC) = [\text{summation of } (W_i \times OC_i)] \times EF(OC)$$

where:

EM(OC) = VOC emissions from the resin mix operations, in pounds per day.

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W_i = the weight of resin mix (i) produced, as specified in d)(2)b., in pounds per day.

OC_i = the VOC content of mix (i), as specified in d)(2)c., in percent by weight.

$EF(OC)$ = the emissions factor from AP-42 Chapter 6.4, Table 6.4-1 (1/95) for VOC emissions from mixing acrylic varnish, which is 0.01 pound per pound of available VOC content.

c. Emission Limitation:

16.43 tons of VOC per year, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be based on maintaining the daily records as required in d)(2), and adding the daily VOC emissions from all resins, as recorded each day in d)(2)d and calculated per f)(1)b, from this resin mixing unit, for the calendar year, and this total (pounds per year) shall be divided by 2000 pounds per ton.

d. Emission Limitation:

2.18 tons of OC per month, from cleanup materials facility wide.

Applicable Compliance Method:

Compliance shall be based on maintaining the monthly records as required in d)(3). Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

$EC(OC)$ = summation of ($V_i \times OC_i$) daily over a month

where:

$EC(OC)$ = OC emissions from the cleanup materials, in pounds per month.

V_i = the volume of cleanup material applied, as specified in d)(3)c, in gallons per month.

OC_i = the OC content of cleanup material i , as specified in d)(3)d, in pounds per gallon.

The summation of all the cleanup material emissions from all emission units on a monthly basis.

e. Emission Limitation:

26.14 tons of OC per year, from cleanup materials facility wide.

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Applicable Compliance Method:

Compliance shall be based on maintaining the monthly records as required in d)(3), and by summing the monthly OC emissions from all cleanup materials, as recorded each month in d)(3)e., from all emission units, for the calendar year, and this total (in pounds per year) shall be divided by 2000 pounds per ton.

f. Emission Limitation:

2.58 pounds of PE per hour.

Applicable Compliance Method:

Limitation is based on OAC rule 3745-17-11(B) and compliance shall be based upon the following equation:

$$E(PE) = P \times \text{CONCsolid} \times EF(PE) \times (1-CE)$$

where:

P = maximum mix production rate, which is 1000 lbs/hr as noted in the permit application.

CONCsolid = maximum solids concentration in the mix, which is 625.0 lbs fillers/1000 lb batch as noted in the permit application.

EF(PE) = Emission factor of 0.01 as noted in AP-42 Chapter 6.4, Reference 4 to Table 6.4-1 (1/95).

CE = efficiency of PE control device is 99.0%, or 0.99, as specified in the permit application.

If required, the permittee shall demonstrate compliance using Method 1-5 of 40 CFR Part 60, Appendix A.

g. Emission Limitation:

0.07 pound of PE per hour.

Applicable Compliance Method:

Compliance shall be based upon the following equation:

$$E(PE) = P \times \text{CONCsolid} \times EF(PE) \times (1-CE)$$

where:

P = maximum mix production rate, which is 1000 lbs/hr as noted in the permit application.

CONCsolid = maximum solids concentration in the mix, which is 625.0 lbs fillers/1000 lb batch as noted in the permit application.

EF(PE) = Emission factor of 0.01 as noted in AP-42 Chapter 6.4, Reference 4 to Table 6.4-1 (1/95).

CE = efficiency of PE control device is 99.0%, or 0.99, as specified in the permit application.

If required, the permittee shall demonstrate compliance using Method 1-5 of 40 CFR Part 60, Appendix A.

h. Emission Limitation:

0.31 tons of PE per year.

Applicable Compliance Method:

The permittee may demonstrate compliance with the annual allowable PE limitation above by multiplying the maximum hourly controlled PE rate [(6.25 pounds/hour) \times (1-0.99)=0.07 pounds/hour] by the maximum annual number of hours of operation (8760 hours/year), and then dividing by 2000 pounds/ton.

i. Emission Limitation:

Visible emissions shall not exceed 20% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method:

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

j. Emission Limitation:

PE shall be less than 10 tons per year.

Applicable Compliance Method:

The permittee may demonstrate compliance with the annual allowable PE limitation above by multiplying the maximum hourly controlled PE rate [(6.25 pounds/hour) \times (1-0.99)=0.06 pounds/hour] by the maximum annual number of hours of operation (8760 hours/year), and then dividing by 2000 pounds/ton.

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group - Pultrusion Streams A & B: P002 and P003.

EU ID	Operations, Property and/or Equipment Description
P002	Pultrusion Line A equipped with a cut-off saw and a common baghouse.
P003	Pultrusion Line B equipped with a cut-off saw and a common baghouse.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
- (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 2.5 pounds per hour and 7.3 tons per year. See b)(2)a.</p> <p>Organic Compound (OC) emissions from clean-up materials from all mixing and pultrusion lines at this facility shall not exceed 2.18 tons per month and 26.14 tons per year. See b)(2)d.</p>
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<p>Particulate emissions (PE) shall not exceed 0.004 pound per hour and 0.02 ton per year.</p> <p>See b)(2)e.</p>
c.	OAC rule 3745-31-05(D)	See 2. through 4. of Section B.
d.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935)</p> <p>[In accordance with 40 CFR 63.5805(b), this emissions unit is a pultrusion operation at an existing area source that became a major source after the date of publication</p>	<p>Reduce total organic HAP emissions by at least 60 weight percent either on an individual basis or by averaging.</p> <p>[40 CFR 63.5805 and Table 3]</p> <p>Work practice standards must be followed in accordance with the applicable portions</p>

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	of this subpart subject to the emissions limitations/control measures specified in this section.]	of 40 CFR 63.5805 and Table 4. See c)(3)
e.	40 CFR Part 63, Subpart A	See b)(2)c.
f.	OAC rule 3745-17-07(A)	Visible emissions (VE) shall not exceed 20% opacity as a 6-minute average.
g.	OAC rule 3745-17-11(B)	Particulate Emissions (PE) shall not exceed 1.07 pounds per hour.
h.	OAC rule 3745-21-07(G)(2)	Photochemically reactive OC emissions shall not exceed 40 pounds per day. See b)(2)a and b)(2)g.
i.	OAC Rule 3745-21-25	Reduce total VOC emissions by at least sixty percent by weight. Work practice standards must be followed in accordance with the applicable portions of Table 1.
j.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06	See b)(2)b.
i.k.	OAC rule 3745-114	See b)(2)f.

(2) Additional Terms and Conditions

- a. The VOC emissions from the resin bath operation consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

Each day that a photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all coatings and photochemically reactive cleanup materials shall not exceed 40 pounds per day. OC emissions from cleanup material that is not a photochemically reactive material shall not be included in showing compliance with these emission limitations.

The OC emission limitations of 40 pounds per day when photochemically reactive coatings or clean up materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring,

record keeping, reporting and testing requirements related to this daily limitation included in d)(3), e)(1)d, and f)(1)b shall be void.

- b. The following terms and conditions apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
 - i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this source since the controlled annual emissions rate for PE is less than 10 tons/yr taking into account the use of a fabric filter system with a minimum control efficiency of 99% by weight.
- c. Table 15 to 40 CFR Part 63, Subpart WWWW shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- d. These emission limitations consist of the clean-up emissions from all the mixing and pultrusion lines which include the following emission units: P001, P002, P003, P004, P005, and P006.
- e. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.
- f. The toxic emissions from this emission unit are subject to 40 CFR Part 63 Subpart WWWW, and therefore satisfy the requirements for a toxic impact evaluation.
- g. The emissions from the clean-up operation shall be exempt from this requirement due to the use of a non-photochemically reactive material.

This restriction shall cease to be effective and federally enforceable on the date the U.S EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitation, monitoring, record keeping, and reporting requirements related to this restriction in c)(2), d)(3), and e)(1) shall be void.

c) Operational Restrictions

- (1) The permittee shall operate the particulate control, fabric filter system whenever this emissions unit is in operation.

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- (2) The permittee shall use only non-HAP, non-VOC, non-photochemically reactive material (eg. acetone) for cleanup of this emission unit.
- (3) The permittee shall keep all containers that store HAP-containing and/or VOC-containing materials closed or covered, except during the addition and removal of materials.
- (4) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart WWWW, including the following sections by December 5, 2009:

a.	63.5805(b)	Table 3, No. 9 – reduce total organic HAP emissions by at least 60 percent by weight
b.	63.5830(a), (b), (c), (d), or (e)	Standards for pultrusion operations subject to the 60 percent by weight organic HAP emissions reduction requirement
c.	63.5805(b)	Table 4 – work practice standards

- (5) The permittee shall comply with the applicable restrictions required under OAC rule 3745-21-25, including the following sections:
 - a. Table 1 – work practice standards for cleaning operations and VOC-containing materials storage operations.
 - b. Table 2 – reduce total VOC emissions by at least sixty percent by weight using any of the options specified in paragraphs (I)(1) through (I)(5).

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission

incident under item d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (2) The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each resin employed;
 - b. the weight of resin employed, in pounds and identify how much of each resin was subject to preform injection, enclosed bath pultrusion, or open bath pultrusion (subject to initial compliance dates as specified in table 2 and 13 of 40 CFR Part 63, Subpart WWWW);
 - c. the VOC content of resin employed (e.g. styrene), in percent by weight;
 - d. the total VOC emissions rate for resin employed (e.g. styrene), calculated as required in f)(1)b., in pounds per day;
 - e. the actual number of hours that the emissions unit was in operation;
 - f. the average hourly VOC emission rate for resin employed (e.g. styrene), calculated by d./e., in average, pounds per hour.
- (3) The permittee shall collect and record the following information for each month (total plantwide, except for cleanup on coating lines):
 - a. the company identification for each cleanup material employed;
 - b. the identification of whether or not each cleanup material employed is photochemically reactive, a VOC, or contains HAP;
 - c. the volume of each cleanup material applied in gallons;
 - d. the OC content of each cleanup material applied in pounds per gallon;
 - e. the combined total emission rate from all emission units for all cleanup material, except the coating lines, at this facility, in pounds per month as calculated in f)(1)d. (all used assumed to evaporate).
- (4) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emission unit was in operation.
- (5) The permittee shall maintain records of the facility's potential to emit for each individual hazardous air pollutant (HAP) emission and the total of all HAP emissions combined by maintaining a formal up-to-date HAP emissions inventory from all HAP emission's units a

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the facility. The permittee shall maintain a record including methods, procedures, and assumptions supporting the calculations.

- (6) Retain a copy of all records on-site, including calculations and supporting information for at least 5 years.
- (7) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart WWWW, including the following sections by December 5, 2009:

a.	63.5895(c)	Resin and gel coat use records
b.	63.5895(e)	Wet area enclosures records
c.	63.5900(a)	Organic HAP content limits compliance
d.	63.5900(b)	Deviation reporting
e.	63.5900(c)	Compliance with Table 4 work practice standards
F	63.5915(a), (c), and (d)	Required overall records that should be maintained

- (8) The permittee shall comply with the applicable monitoring and recordkeeping requirements under OAC rule 3745-21-25, paragraphs (O) and (P), which include:
 - a. A certified statement that operations are in compliance with the work practice standards specified in Table 1 of this rule, as applicable;
 - b. Collecting and keeping records of resin use, monomer content, and operations where the resin is used. The monomer content records may be based on MSDS or on resin specifications supplied by the resin supplier;
 - c. For any operations listed in Table 2, 3, or 4 of this rule all data, assumptions, and calculations used to determine monomer contents and VOC emissions factors, and;
 - d. The owner or operator shall record all times that doors or covers of wet area enclosures are open in the pultrusion emission unit and there is resin present in the resin bath.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports which include the following information:

- a. an identification of each day during which the average hourly VOC emissions, excluding cleanup materials, from this emission unit exceeded 2.5 pounds per hour, and the actual average hourly VOC emissions for each such day;
 - b. an identification of each day during which the VOC emissions, excluding cleanup materials, from this emissions unit exceeded 40.0 pounds per day or 7.3 tons per year, and the actual VOC emissions for each such time period;
 - c. an identification of each month during which the combined OC emissions from cleanup materials, exceeded 2.18 tons per month from all mixing and pultrusion lines at the facility, and the actual OC emissions for each such month;
 - d. an identification of each month during which any HAP, VOC, or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;
 - e. an identification of each day during which an inspection was not performed by the required frequency;
 - f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented;
 - g. an identification of each month of a 12-month rolling period in which the total organic HAP emissions were not reduced at least 60 percent by weight for the combined emissions of all pultrusion units, facility-wide. The actual emissions reported and the percent reduction calculated for each such period (subject to initial compliance dates as specified in table 2 and 13 of 40 CFR Part 63, Subpart WWWW);
 - h. if no deviations, report no deviations.
- (2) The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the particulate control filter was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
 - (3) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.
 - (4) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart WWWW, per the following sections with the first report due by January 31, 2010:

a.	63.5910(a)	Table 14 – semi-annual compliance report
b.	63.5910(b)	Submittal date of reports in accordance with Table 14
c.	63.5910(c)	Content of compliance reports
d.	63.5910 (d), (e), and (f)	Submission of deviation reports
e.	63.5910(g)	Title V monitoring report allowance

(5) The permittee shall submit a semiannual compliance report that contains the relevant information and submitted on the stated dates as specified by paragraph (Q) of OAC rule 3745-21-25. If the semiannual compliance report required by the Title V permit includes all the information required for this rule, the report required by the Title V permit shall be deemed to satisfy any obligation for reporting for this rule.

(6) If the permittee has an affected operation that has an initial startup date before the effective date of OAC rule 3745-21-25, the permittee shall notify the appropriate Ohio environmental protection agency or local air agency in writing that such operation is subject to this rule. The notification, which shall be submitted not later than sixty days after the effective date of this rule, shall provide the following information:

- a. Name and address of the owner or operator
- b. Address (i.e., physical location) of the facility;
- c. Equipment description and Ohio EPA application number of the affected operation;
- d. Identification of the applicable requirements, the means of compliance, and the compliance date for the effective operation under this rule; and
- e. Regarding a permit for the affected operation, whichever of the following is applicable:
 - i. Submission of an application for an operating permit, a permit modification, or an operating permit renewal in accordance with rule 3745-31-02 of the administrative code; or
 - ii. Submission of a statement of intent to submit an application for a Title V permit or modification of a Title V permit in accordance with rule 3745-77-02 or 3745-77-06 of the administrative code, respectively.

f) Testing Requirements

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

a. Emission Limitation:

2.5 pounds of VOC per hour, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by dividing the daily VOC emissions, as recorded in d)(2)d., by the number of actual hours that the emission unit was in operation, as recorded in d)(2)e.

If required, the permittee shall demonstrate compliance with this emission limitation through testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents.

The permittee shall also determine the capture efficiency using Methods 204A through 204F, as appropriate, of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

b. Emission Limitation:

40.0 pounds of VOC per day, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be determined in accordance with the record keeping requirements specified in d)(2)b. & c. Compliance shall be determined based upon the following equation:

where:

$$E(OC) = \text{summation of } (W_i \times OC_i) \times EF(OC_i)$$

where:

$E(OC)$ = VOC emissions as from all resin operations (e.g., styrene), in pounds per day.

W_i = the weight of resin i employed, as specified in d)(2)b., in pounds per day.

OC_i = the VOC content of resin i , as specified in d)(2)c., in percent by weight.

$$EF(OC_i) = 0.04$$

For VOC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88))

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

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

c. Emission Limitation:

7.3 tons of VOC per year, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be based on maintaining the daily records as required in d)(2), and summing the daily VOC emissions from all resins, as recorded each day in d)(2)d. and calculated per f)(1)b., from this pultrusion unit, for the calendar year, and this total (lbs/year) shall be divided by 2000 pounds per ton.

d. Emission Limitation:

2.18 tons of OC per month, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

Compliance shall be based on maintaining the monthly records as required in d)(3). Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

$EC(OC) = \text{summation of } (V_i \times OC_i) \text{ daily over a month}$

where:

$EC(OC) = \text{OC emissions from the cleanup materials, in pounds per month.}$

$V_i = \text{the volume of cleanup material applied, as specified in d)(3)c., in gallons per month.}$

$OC_i = \text{the OC content of cleanup material } i, \text{ as specified in d)(3)d., in pounds per gallon.}$

The summation of all the cleanup material emissions from all emission units on a monthly basis.

e. Emission Limitation:

26.14 tons of OC per year, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

Compliance shall be based on maintaining the monthly records as required in d)(3), and by summing the monthly OC emissions from all cleanup materials, as recorded each month in d)(3)e., from all emission units, for the calendar year, and this total (lbs/year) shall be divided by 2000 pounds per ton.

f. Emission Limitation:

1.07 pounds of PE per hour.

Applicable Compliance Method:

Limitation is based on OAC rule 3745-17-11(B) and compliance is based on the following equation:

$$PE(SAW) = V(SC) \times CUT(MIN) \times DENSITY \times (1 - CE) \times 60 \text{ MIN/HR}$$

where:

PE(SAW) = particulate emission on cut-off saw on pultrusion line (lbs/hr)

V(SC) = volume of material removed by saw cut (cross sectional area x width of blade), blade width (0.1875 in), cross sectional area (0.0625 ft²) totaling (0.001 ft³)

CUT(MIN)= 0.500 cuts/minute

DENSITY= 12 lb/ft³

CE= control efficiency (99%)

If required, the permittee shall demonstrate compliance using Methods 1 through 5 of 40 CFR Part 60, Appendix A.

g. Emission Limitation:

0.004 pounds of PE per hour.

Applicable Compliance Method:

Compliance is based on the following equation:

$$PE(SAW) = V(SC) \times CUT(MIN) \times DENSITY \times (1 - CE) \times 60 \text{ MIN/HR}$$

where:

PE(SAW) = particulate emission on cut-off saw on pultrusion line (lbs/hr)

V(SC) = volume of material removed by saw cut (cross sectional area x width of blade), blade width (0.1875 in), cross sectional area (0.0625 ft²) totaling (0.001 ft³)

CUT(MIN)= 0.500 cuts/minute

DENSITY= 12 lb/ft³

CE= control efficiency (99%)

If required, the permittee shall demonstrate compliance using Methods 1 through 5 of 40 CFR Part 60, Appendix A.

h. Emission Limitation:

0.02 tons of PE per year.

Applicable Compliance Method:

The permittee may demonstrate compliance with the annual allowable PE limitation above by multiplying the maximum hourly controlled PE rate [(0.36 pounds/hour) \times (1-0.99)=0.004 pounds/hour] by the maximum annual number of hours of operation (8760 hours/year), and then dividing by 2000 pounds/ton.

i. Emission Limitation:

VE shall not exceed 20% opacity of visible PE, as a 6-minute average.

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).

j. Emission Limitation:

Reduce total organic HAP emissions by at least 60 weight percent either on an individual basis or by averaging.

Applicable Compliance Method:

The permittee shall demonstrate compliance through one of the options as required pursuant to 40 CFR 63, Subpart WWWW, per the following sections: 63.5830 and 63.5850. Compliance shall be demonstrated in accordance with the option(s) the permittee has selected by December 5, 2010.

g) Miscellaneous Requirements

(1) None.

3. P004, Pultrusion Streams C

Operations, Property and/or Equipment Description:

Pultrusion Line C equipped with a cut-off saw and a common bag house.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 4.9 pounds per hour and 7.3 tons per year. See b)(2)a.</p> <p>Organic Compound (OC) emissions from clean-up materials from all mixing and pultrusion lines at this facility shall not exceed 2.18 tons per month and 26.14 tons per year. See b)(2)d.</p>
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<p>Particulate emissions (PE) shall not exceed 0.004 pound per hour and 0.02 ton per year.</p> <p>See b)(2)e.</p>
c.	OAC rule 3745-31-05(D)	See 2. through 4. of Section B.
d.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935)</p> <p>[In accordance with 40 CFR 63.5805(b), this emissions unit is a pultrusion operation at an existing area source that became a major source after the date of publication of this subpart subject to the</p>	<p>Reduce total organic HAP emissions by at least 60 weight percent either on an individual basis or by averaging.</p> <p>[40 CFR 63.5805 and Table 3]</p> <p>Work practice standards must be followed in accordance with the applicable portions of 40 CFR 63.5805 and Table 4.</p>

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	emissions limitations/control measures specified in this section.]	See c)(3)
e.	40 CFR Part 63, Subpart A	See b)(2)c.
f.	OAC rule 3745-17-07(A)	Visible emissions (VE) shall not exceed 20% opacity as a 6-minute average.
g.	OAC rule 3745-17-11(B)	Particulate Emissions (PE) shall not exceed 1.07 pounds per hour.
h.	OAC rule 3745-21-07(G)(2)	Photochemically reactive OC emissions shall not exceed 40 pounds per day. See b)(2)a and b)(2)g.
i.	OAC Rule 3745-21-25	Reduce total VOC emissions by at least sixty percent by weight. Work practice standards must be followed in accordance with the applicable portions of Table 1.
j.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06	See b)(2)b.
i.k.	OAC rule 3745-114	See b)(2)f.

(2) Additional Terms and Conditions

- a. The VOC emissions from the resin bath operation consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

Each day that a photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all coatings and photochemically reactive cleanup materials shall not exceed 40 pounds per day. OC emissions from cleanup material that is not a photochemically reactive material shall not be included in showing compliance with these emission limitations.

The OC emission limitations of 40 pounds per day when photochemically reactive coatings or clean up materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring,

record keeping, reporting and testing requirements related to these hourly and daily limitations included in d)(3), e)(1)d, and f)(1)b shall be void.

- b. The following terms and conditions apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
 - i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this source since the controlled annual emissions rate for PE is less than 10 tons/yr taking into account the use of a fabric filter system with a minimum control efficiency of 99% by weight.
- c. Table 15 to 40 CFR Part 63, Subpart WWWW shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- d. These emission limitations consist of the clean-up emissions from all the mixing and pultrusion lines which include the following emission units: P001, P002, P003, P004, P005, and P006.
- e. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.
- f. The toxic emissions from this emission unit are subject to 40 CFR Part 63 Subpart WWWW, and therefore satisfy the requirements for a toxic impact evaluation.
- g. The emissions from the clean-up operation shall be exempt from this requirement due to the use of a non-photochemically reactive material.

This restriction shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitation, monitoring, recordkeeping, and reporting requirements related to this restriction in c)(2), d)(3), and e)(1) shall be void.

c) Operational Restrictions

- (1) The permittee shall operate the particulate control, fabric filter system whenever this emissions unit is in operation.
- (2) The permittee shall use only non-HAP, non-VOC, non-photochemically reactive material (eg. acetone) for cleanup of this emission unit.
- (3) The permittee shall keep all containers that store HAP-containing and/or VOC-containing materials closed or covered, except during the addition and removal of materials.
- (4) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart WWWW, including the following sections by December 5, 2009:

a.	63.5805(b)	Table 3, No. 9 – reduce total organic HAP emissions by at least 60 percent by weight.
b.	63.5830(a), (b), (c), (d), or (e)	Standards for pultrusion operations subject to the 60 percent by weight organic HAP emissions reduction requirement
c.	63.5805(b)	Table 4 – work practice standards

- (5) The permittee shall comply with the applicable restrictions required under OAC rule 3745-21-25, including the following sections:
 - a. Table 1 – work practice standards for cleaning operations and VOC-containing materials storage operations.
 - b. Table 2 – reduce total VOC emissions by at least sixty percent by weight using any of the options specified in paragraphs (I)(1) through (I)(5).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and

- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (2) The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each resin employed;
 - b. the weight of resin employed, in pounds and identify how much of each resin was subject to preform injection, enclosed bath pultrusion, or open bath pultrusion (subject to initial compliance dates as specified in table 2 and 13 of 40 CFR Part 63, Subpart WWWW);
 - c. the VOC content of resin employed (e.g. styrene), in percent by weight;
 - d. the total VOC emissions rate for resin employed (e.g. styrene), calculated as required in f)(1)b., in pounds per day;
 - e. the actual number of hours that the emissions unit was in operation;
 - f. the average hourly VOC emission rate for resin employed (e.g. styrene), calculated by d./e., in average, pounds per hour.
- (3) The permittee shall collect and record the following information for each month (total plantwide, except for cleanup on coating lines):
 - a. the company identification for each cleanup material employed;
 - b. the identification of whether or not each cleanup material employed is photochemically reactive, a VOC, or contains HAP;
 - c. the volume of each cleanup material applied in gallons;
 - d. the OC content of each cleanup material applied in pounds per gallon;
 - e. the combined total emission rate from all emission units for all cleanup material, except the coating lines, at this facility, in pounds per month as calculated in f)(1)d. (all used assumed to evaporate).
- (4) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emission unit was in operation.

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- (5) The permittee shall maintain records of the facility's potential to emit for each individual hazardous air pollutant (HAP) emission and the total of all HAP emissions combined by maintaining a formal up-to-date HAP emissions inventory from all HAP emission's units a the facility. The permittee shall maintain a record including methods, procedures, and assumptions supporting the calculations.
- (6) Retain a copy of all records on-site, including calculations and supporting information for at least 5 years.
- (7) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart WWWW, including the following sections by December 5, 2009:

a.	63.5895(c)	Resin and gel coat use records
b.	63.5895(e)	Wet area enclosures records
c.	63.5900(a)	Organic HAP content limits compliance
d.	63.5900(b)	Deviation reporting
e.	63.5900(c)	Compliance with Table 4 work practice standards
f.	63.5915(a), (c), (d)	Required overall records that should be maintained

- (8) The permittee shall comply with the applicable monitoring and recordkeeping requirements under OAC rule 3745-21-25, paragraphs (O) and (P), which include:
 - a. A certified statement that operations are in compliance with the work practice standards specified in Table 1 of this rule, as applicable;
 - b. Collecting and keeping records of resin use, monomer content, and operations where the resin is used. The monomer content records may be based on MSDS or on resin specifications supplied by the resin supplier;
 - c. For any operations listed in Table 2, 3, or 4 of this rule all data, assumptions, and calculations used to determine monomer contents and VOC emissions factors; and
 - d. The owner or operator shall record all times that doors or covers of wet area enclosures are open in the pultrusion emission unit and there is resin present in the resin bath.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports which include the following information:

- a. an identification of each day during which the average hourly VOC emissions, excluding cleanup materials, from this emission unit exceeded 2.5 pounds per hour, and the actual average hourly VOC emissions for each such day;
 - b. an identification of each day during which the VOC emissions, excluding cleanup materials, from this emissions unit exceeded 40.0 pounds per day or 7.3 tons per year, and the actual VOC emissions for each such time period;
 - c. an identification of each month during which the combined OC emissions from cleanup materials, exceeded 2.18 tons per month from all mixing and pultrusion lines at the facility, and the actual OC emissions for each such month;
 - d. an identification of each month during which any HAP, VOC, or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;
 - e. an identification of each day during which an inspection was not performed by the required frequency;
 - f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented;
 - g. an identification of each month of a 12-month rolling period in which the total organic HAP emissions were not reduced at least 60 percent by weight for the combined emissions of all pultrusion units, facility-wide. The actual emissions reported and the percent reduction calculated for each such period (subject to initial compliance dates as specified in table 2 and 13 of 40 CFR Part 63, Subpart WWWW);
 - h. if no deviations, report no deviations.
- (2) The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the particulate control filter was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
- (3) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (4) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart WWWW, per the following sections with the first report due by January 31, 2010:

Effective Date: To be entered upon final issuance

a.	63.5910(a)	Table 14 – semi-annual compliance report
b.	63.5910(b)	Submittal date of reports in accordance with Table 14
c.	63.5910(c)	Content of compliance reports
d.	63.5910(d), (e), (f)	Submission of deviation reports
e.	63.5910(g)	Title V monitoring report allowance

(5) The permittee shall submit a semiannual compliance report that contains the relevant information and submitted on the stated dates as specified by paragraph (Q) of OAC rule 3745-21-25. If the semiannual compliance report required by the Title V permit includes all the information required for this rule, the report required by the Title V permit shall be deemed to satisfy any obligation for reporting for this rule.

(6) If the permittee has an effected operation that has an initial startup date before the effective date of OAC rule 3745-21-25 shall notify the appropriate Ohio environmental protection agency or local air agency in writing that such operation is subject to this rule. The notification, which shall be submitted not later than sixty days after the effective date of this rule, shall provide the following information:

- a. Name and address of the owner or operator
- b. Address (i.e., physical location) of the facility;
- c. Equipment description and Ohio EPA application number of the affected operation;
- d. Identification of the applicable requirements, the means of compliance, and the compliance date for the effective operation under this rule; and
- e. Regarding a permit for the affected operation, whichever of the following is applicable:
 - i. Submission of an application for an operating permit, a permit modification, or an operating permit renewal in accordance with rule 3745-31-02 of the administrative code; or
 - ii. Submission of a statement of intent to submit an application for a Title V permit or modification of a Title V permit in accordance with rule 3745-77-02 or 3745-77-06 of the administrative code, respectively.

f) Testing Requirements

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

a. Emission Limitation:

4.9 pounds of VOC per hour, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by dividing the daily VOC emissions, as recorded in d)(2)d., by the number of actual hours that the emission unit was in operation, as recorded in d)(2)e.

If required, the permittee shall demonstrate compliance with this emission limitation through testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents.

The permittee shall also determine the capture efficiency using Methods 204A through 204F, as appropriate, of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

b. Emission Limitation:

40.0 pounds of VOC per day, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be determined in accordance with the record keeping requirements specified in d)(2)b. & c. Compliance shall be determined based upon the following equation:

where:

$$E(OC) = \text{summation of } (W_i \times OC_i) \times EF(OC_i)$$

where:

$E(OC)$ = VOC emissions as from all resin operations (e.g., styrene), in pounds per day.

W_i = the weight of resin i employed, as specified in d)(2)b., in pounds per day.

OC_i = the VOC content of resin i , as specified in d)(2)c., in percent by weight.

$$EF(OC_i) = 0.04$$

For VOC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88))

Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

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

c. Emission Limitation:

7.3 tons of VOC per year, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be based on maintaining the daily records as required in d)(2), and summing the daily VOC emissions from all resins, as recorded each day in d)(2)d. and calculated per f)(1)b., from this pultrusion unit, for the calendar year, and this total (lbs/year) shall be divided by 2000 pounds per ton.

d. Emission Limitation:

2.18 tons of OC per month, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

Compliance shall be based on maintaining the monthly records as required in d)(3). Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

$EC(OC) = \text{summation of } (V_i \times OC_i) \text{ daily over a month}$

where:

$EC(OC) = \text{OC emissions from the cleanup materials, in pounds per month.}$

$V_i = \text{the volume of cleanup material applied, as specified in d)(3)c., in gallons per month.}$

$OC_i = \text{the OC content of cleanup material } i, \text{ as specified in d)(3)d., in pounds per gallon.}$

The summation of all the cleanup materials from all emission units on a monthly basis.

e. Emission Limitation:

26.14 tons of OC per year, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

Compliance shall be based on maintaining the monthly records as required in d)(3), and by summing the monthly OC emissions from all cleanup materials, as recorded each month in d)(3)e., from all emission units, for the calendar year, and this total (lbs/year) shall be divided by 2000 pounds per ton.

f. Emission Limitation:

1.07 pounds of PE per hour.

Applicable Compliance Method:

Limitation is based on OAC rule 3745-17-11(B) and compliance is based on the following equation:

$$PE(SAW) = V(SC) \times CUT(MIN) \times DENSITY \times (1 - CE) \times 60 \text{ MIN/HR}$$

where:

PE(SAW) = particulate emission on cut-off saw on pultrusion line (lbs/hr)

V(SC) = volume of material removed by saw cut (cross sectional area x width of blade), blade width (0.1875 in), cross sectional area (0.0625 ft²) totaling (0.001 ft³)

CUT(MIN)= 0.500 cuts/minute

DENSITY= 12 lb/ft³

CE= control efficiency (99%)

If required, the permittee shall demonstrate compliance using Methods 1 through 5 of 40 CFR Part 60, Appendix A.

g. Emission Limitation:

0.004 pounds of PE per hour.

Applicable Compliance Method:

Compliance is based on the following equation:

$$PE(SAW) = V(SC) \times CUT(MIN) \times DENSITY \times (1 - CE) \times 60 \text{ MIN/HR}$$

where:

PE(SAW) = particulate emission on cut-off saw on pultrusion line (lbs/hr)

V(SC) = volume of material removed by saw cut (cross sectional area x width of blade), blade width (0.1875 in), cross sectional area (0.0625 ft²) totaling (0.001 ft³)

CUT(MIN)= 0.500 cuts/minute

DENSITY= 12 lb/ft³

CE= control efficiency (99%)

If required, the permittee shall demonstrate compliance using Methods 1 through 5 of 40 CFR Part 60, Appendix A.

h. Emission Limitation:

0.02 tons of PE per year.

Applicable Compliance Method:

The permittee may demonstrate compliance with the annual allowable PE limitation above by multiplying the maximum hourly controlled PE rate [(0.36 pounds/hour) \times (1-0.99)=0.004 pounds/hour] by the maximum annual number of hours of operation (8760 hours/year), and then dividing by 2000 pounds/ton.

i. Emission Limitation:

VE shall not exceed 20% opacity of visible PE, as a 6-minute average.

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).

j. Emission Limitation:

Reduce total organic HAP emissions by at least 60 weight percent either on an individual basis or by averaging.

Applicable Compliance Method:

The permittee shall demonstrate compliance through one of the options as required pursuant to 40 CFR 63, Subpart WWWW, per the following sections: 63.5830 and 63.5850. Compliance shall be demonstrated in accordance with the option(s) the permittee has selected by December 5, 2010.

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group - Pultrusion Streams D & E: P005 and P006.

EU ID	Operations, Property and/or Equipment Description
P005	Pultrusion Line D equipped with a cut-off saw and a common baghouse.
P006	Pultrusion Line E equipped with a cut-off saw and a common baghouse.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
- (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 3.6 pounds per hour and 7.3 tons per year. See b)(2)a.</p> <p>Organic Compound (OC) emissions from clean-up materials from all mixing and pultrusion lines at this facility shall not exceed 2.18 tons per month and 26.14 tons per year. See b)(2)d.</p>
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<p>Particulate emissions (PE) shall not exceed 0.005 pound per hour and 0.03 ton per year.</p> <p>See b)(2)e.</p>
c.	OAC rule 3745-31-05(D)	See 2. through 4. of Section B.
d.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935)</p> <p>[In accordance with 40 CFR 63.5805(b), this emissions unit is a pultrusion operation at an existing area source that became a major source after the date of publication</p>	<p>Reduce total organic HAP emissions by at least 60 weight percent either on an individual basis or by averaging.</p> <p>[40 CFR 63.5805 and Table 3]</p> <p>Work practice standards must be followed in accordance with the applicable portions</p>

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	of this subpart subject to the emissions limitations/control measures specified in this section.]	of 40 CFR 63.5805 and Table 4. See c)(3)
e.	40 CFR Part 63, Subpart A	See b)(2)c.
f.	OAC rule 3745-17-07(A)	Visible emissions (VE) shall not exceed 20% opacity as a 6-minute average.
g.	OAC rule 3745-17-11(B)	Particulate Emissions (PE) shall not exceed 1.07 pounds per hour.
h.	OAC rule 3745-21-07(G)(2)	Photochemically reactive OC emissions shall not exceed 40 pounds per day. See b)(2)a and b)(2)g.
i.	OAC Rule 3745-21-25	Reduce total VOC emissions by at least sixty percent by weight. Work practice standards must be followed in accordance with the applicable portions of Table 1.
j.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06	See b)(2)b.
i.k.	OAC rule 3745-114	See b)(2)f.

(2) Additional Terms and Conditions

- a. The VOC emissions from the resin bath operation consist of styrene, a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

Each day that a photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all coatings and photochemically reactive cleanup materials shall not exceed 40 pounds per day. OC emissions from cleanup material that is not a photochemically reactive material shall not be included in showing compliance with these emission limitations.

The OC emission limitations of 40 pounds per day when photochemically reactive coatings or clean up materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring,

record keeping, reporting and testing requirements related to these hourly and daily limitations included in d)(3), e)(1)d, and f)(1)b shall be void.

- b. The following terms and conditions apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
 - i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this source since the controlled annual emissions rate for PE is less than 10 tons/yr taking into account the use of a fabric filter system with a minimum control efficiency of 99% by weight.
- c. Table 15 to 40 CFR Part 63, Subpart WWWW shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- d. These emission limitations consist of the clean-up emissions from all the mixing and pultrusion lines which include the following emission units: P001, P002, P003, P004, P005, and P006.
- e. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.
- f. The toxic emissions from this emission unit are subject to 40 CFR Part 63 Subpart WWWW, and therefore satisfy the requirements for a toxic impact evaluation.
- g. The emissions from the clean-up operation shall be exempt from this requirement due to the use of a non-photochemically reactive material.

This restriction shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitation, monitoring, recordkeeping, and reporting requirements related to this restriction in c)(2), d)93, and e)(1) shall be void.

c) Operational Restrictions

- (1) The permittee shall operate the particulate control, fabric filter system whenever this emissions unit is in operation.

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- (2) The permittee shall use only non-HAP, non-VOC, non-photochemically reactive material (eg. acetone) for cleanup of this emission unit.
- (3) The permittee shall keep all containers that store HAP-containing and/or VOC-containing materials closed or covered, except during the addition and removal of materials.
- (4) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart WWWW, including the following sections by December 5, 2009:

a.	63.5805(b)	Table 3, No. 9 – reduce total organic HAP emissions by at least 60 percent by weight
b.	63.5830(a), (b), (c), (d), or (e)	Standards for pultrusion operations subject to the 60 percent by weight organic HAP emissions reduction requirement
c.	63.5805(b)	Table 4 – work practice standards

- (5) The permittee shall comply with the applicable restrictions required under OAC rule 3745-21-25, including the following sections:
 - a. Table 1 – work practice standards for cleaning operations and VOC-containing materials storage operations.
 - b. Table 2 – reduce total VOC emissions by at least sixty percent by weight using any of the options specified in paragraphs (I)(1) through (I)(5).

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission

incident under item d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (2) The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each resin employed;
 - b. the weight of resin employed, in pounds and identify how much of each resin was subject to preform injection, enclosed bath pultrusion, or open bath pultrusion (subject to initial compliance dates as specified in table 2 and 13 of 40 CFR Part 63, Subpart WWWW);
 - c. the VOC content of resin employed (e.g. styrene), in percent by weight;
 - d. the total VOC emissions rate for resin employed (e.g. styrene), calculated as required in f)(1)b., in pounds per day;
 - e. the actual number of hours that the emissions unit was in operation;
 - f. the average hourly VOC emission rate for resin employed (e.g. styrene), calculated by d./e., in average, pounds per hour.
- (3) The permittee shall collect and record the following information for each month (total plantwide, except for cleanup on coating lines):
 - a. the company identification for each cleanup material employed;
 - b. the identification of whether or not each cleanup material employed is photochemically reactive, a VOC, or contains HAP;
 - c. the volume of each cleanup material applied in gallons;
 - d. the OC content of each cleanup material applied in pounds per gallon;
 - e. the combined total emission rate from all emission units for all cleanup material, except the coating lines, at this facility, in pounds per month as calculated in f)(1)d. (all used assumed to evaporate).
- (4) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emission unit was in operation.
- (5) The permittee shall maintain records of the facility's potential to emit for each individual hazardous air pollutant (HAP) emission and the total of all HAP emissions combined by maintaining a formal up-to-date HAP emissions inventory from all HAP emission's units a

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the facility. The permittee shall maintain a record including methods, procedures, and assumptions supporting the calculations.

- (6) Retain a copy of all records on-site, including calculations and supporting information for at least 5 years.
- (7) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart WWWW, including the following sections by December 5, 2009:

a.	63.5895(c)	Resin and gel coat use records
b.	63.5895(e)	Wet area enclosures records
c.	63.5900(a)	Organic HAP content limits compliance
d.	69.5900(b)	Deviation reporting
e.	63.5900(c)	Compliance with Table 4 work practice standards
f.	63.5915(a), (c), and (d)	Required overall records that should be maintained

- (8) The permittee shall comply with the applicable monitoring and recordkeeping requirements under OAC rule 3745-21-25, paragraphs (O) and (P), which include:
 - a. A certified statement that operations are in compliance with the work practice standards specified in Table 1 of this rule, as applicable;
 - b. Collecting and keeping records of resin use, monomer content, and operations where the resin is used. The monomer content records may be based on MSDS or on resin specifications supplied by the resin supplier;
 - c. For any operations listed in Table 2, 3, or 4 of this rule all data, assumptions, and calculations used to determine monomer contents and VOC emissions factors, and;
 - d. The owner or operator shall record all times that doors or covers of wet area enclosures are open in the pultrusion emission unit and there is resin present in the resin bath.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports which include the following information:

- a. an identification of each day during which the average hourly VOC emissions, excluding cleanup materials, from this emission unit exceeded 2.5 pounds per hour, and the actual average hourly VOC emissions for each such day;
 - b. an identification of each day during which the VOC emissions, excluding cleanup materials, from this emissions unit exceeded 40.0 pounds per day or 7.3 tons per year, and the actual VOC emissions for each such time period;
 - c. an identification of each month during which the combined OC emissions from cleanup materials, exceeded 2.18 tons per month from all mixing and pultrusion lines at the facility, and the actual OC emissions for each such month;
 - d. an identification of each month during which any HAP, VOC, or photochemically reactive cleanup materials were employed, and the actual OC and individual HAP emissions for each such month;
 - e. an identification of each day during which an inspection was not performed by the required frequency;
 - f. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented;
 - g. an identification of each month of a 12-month rolling period in which the total organic HAP emissions were not reduced at least 60 percent by weight for the combined emissions of all pultrusion units, facility-wide. The actual emissions reported and the percent reduction calculated for each such period (subject to initial compliance dates as specified in table 2 and 13 of 40 CFR Part 63, Subpart WWWW);
 - h. if no deviations, report no deviations.
- (2) The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the particulate control filter was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
 - (3) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.
 - (4) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart WWWW, per the following sections with the first report due by January 31, 2010:

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a.	63.5910(a)	Table 14 – semi-annual compliance report
b.	63.5910(b)	Submittal date of reports in accordance with Table 14
c.	63.5910(c)	Content of compliance reports
d.	63.5910(d), (e), and (f)	Submission of deviation reports
e.	63.5910(g)	Title V monitoring report allowance

- (5) The permittee shall submit a semiannual compliance report that contains the relevant information specified by paragraph (Q) of OAC rule 3745-21-25. If the semiannual compliance report required by the Title V permit includes all the information required for this rule, the report required by the Title V permit shall be deemed to satisfy any obligation for reporting for this rule.
- (6) If the permittee has an effected operation that has an initial startup date before the effective date of OAC rule 3745-21-25 shall notify the appropriate Ohio environmental protection agency or local air agency in writing that such operation is subject to this rule. The notification, which shall be submitted not later than sixty days after the effective date of this rule, shall provide the following information:
- a. Name and address of the owner or operator
 - b. Address (i.e., physical location) of the facility;
 - c. Equipment description and Ohio EPA application number of the affected operation;
 - d. Identification of the applicable requirements, the means of compliance, and the compliance date for the effective operation under this rule; and
 - e. Regarding a permit for the affected operation, whichever of the following is applicable:
 - i. Submission of an application for an operating permit, a permit modification, or an operating permit renewal in accordance with rule 3745-31-02 of the administrative code; or
 - ii. Submission of a statement of intent to submit an application for a Title V permit or modification of a Title V permit in accordance with rule 3745-77-02 or 3745-77-06 of the administrative code, respectively.

f) Testing Requirements

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

a. Emission Limitation:

3.6 pounds of VOC per hour, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by dividing the daily VOC emissions, as recorded in d)(2)d., by the number of actual hours that the emission unit was in operation, as recorded in d)(2)e.

If required, the permittee shall demonstrate compliance with this emission limitation through testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents.

The permittee shall also determine the capture efficiency using Methods 204A through 204F, as appropriate, of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

b. Emission Limitation:

40.0 pounds of VOC per day, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be determined in accordance with the record keeping requirements specified in d)(2)b. & c. Compliance shall be determined based upon the following equation:

where:

$$E(OC) = \text{summation of } (W_i \times OC_i) \times EF(OC_i)$$

where:

$E(OC)$ = VOC emissions as from all resin operations (e.g., styrene), in pounds per day.

W_i = the weight of resin i employed, as specified in d)(2)b., in pounds per day.

OC_i = the VOC content of resin i , as specified in d)(2)c., in percent by weight.

$$EF(OC_i) = 0.04$$

For VOC emissions (styrene), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88))

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Note: Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resin.

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

c. Emission Limitation:

7.3 tons of VOC per year, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be based on maintaining the daily records as required in d)(2), and summing the daily VOC emissions from all resins, as recorded each day in d)(2)d. and calculated per f)(1)b., from this pultrusion unit, for the calendar year, and this total (lbs/year) shall be divided by 2000 pounds per ton.

d. Emission Limitation:

2.18 tons of OC per month, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

Compliance shall be based on maintaining the monthly records as required in d)(3). Determination of OC emissions for all cleanup materials shall be determined based upon the following equation:

$EC(OC) = \text{summation of } (V_i \times OC_i) \text{ daily over a month}$

where:

$EC(OC) = \text{OC emissions from the cleanup materials, in pounds per month.}$

$V_i = \text{the volume of cleanup material applied, as specified in d)(3)c., in gallons per month.}$

$OC_i = \text{the OC content of cleanup material } i, \text{ as specified in d)(3)d., in pounds per gallon.}$

The summation of all the cleanup materials from all emission units on a monthly basis.

e. Emission Limitation:

26.14 tons of OC per year, from cleanup materials facility-wide from all mixing and pultrusion equipment.

Applicable Compliance Method:

Compliance shall be based on maintaining the monthly records as required in d)(3), and by summing the monthly OC emissions from all cleanup materials, as

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recorded each month in d)(3)e., from all emission units, for the calendar year, and this total (lbs/year) shall be divided by 2000 pounds per ton.

f. Emission Limitation:

1.07 pounds of PE per hour.

Applicable Compliance Method:

Limitation is based on OAC rule 3745-17-11(B) and compliance is based on the following equation:

$$PE(SAW) = V(SC) \times CUT(MIN) \times DENSITY \times (1 - CE) \times 60 \text{ MIN/HR}$$

where:

PE(SAW) = particulate emission on cut-off saw on pultrusion line (lbs/hr)

V(SC) = volume of material removed by saw cut (cross sectional area x width of blade), blade width (0.1875 in), cross sectional area (0.0625 ft²) totaling (0.001 ft³)

CUT(MIN)= 0.667 cuts/minute

DENSITY= 12 lb/ft³

CE= control efficiency (99%)

If required, the permittee shall demonstrate compliance using Methods 1 through 5 of 40 CFR Part 60, Appendix A.

g. Emission Limitation:

0.005 pounds of PE per hour.

Applicable Compliance Method:

Compliance is based on the following equation:

$$PE(SAW) = V(SC) \times CUT(MIN) \times DENSITY \times (1 - CE) \times 60 \text{ MIN/HR}$$

where:

PE(SAW) = particulate emission on cut-off saw on pultrusion line (lbs/hr)

V(SC) = volume of material removed by saw cut (cross sectional area x width of blade), blade width (0.1875 in), cross sectional area (0.0625 ft²) totaling (0.001 ft³)

CUT(MIN)= 0.667 cuts/minute

DENSITY= 12 lb/ft³

CE= control efficiency (99%)

If required, the permittee shall demonstrate compliance using Methods 1 through 5 of 40 CFR Part 60, Appendix A.

h. Emission Limitation:

0.03 tons of PE per year.

Applicable Compliance Method:

The permittee may demonstrate compliance with the annual allowable PE limitation above by multiplying the maximum hourly controlled PE rate [(0.48 pounds/hour) \times (1-0.99)=0.005 pounds/hour] by the maximum annual number of hours of operation (8760 hours/year), and then dividing by 2000 pounds/ton.

i. Emission Limitation:

VE shall not exceed 20% opacity of visible PE, as a 6-minute average.

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).

j. Emission Limitation:

Reduce total organic HAP emissions by at least 60 weight percent either on an individual basis or by averaging.

Applicable Compliance Method:

The permittee shall demonstrate compliance through one of the options as required pursuant to 40 CFR 63, Subpart WWWW, per the following sections: 63.5830 and 63.5850. Compliance shall be demonstrated in accordance with the option(s) the permittee has selected by December 5, 2010.

g) Miscellaneous Requirements

(1) None.