



Street Address:

State of Ohio Environmental Protection Agency
Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL
ASHTABULA COUNTY
Application No: 02-14258**

CERTIFIED MAIL

DATE: 10/17/2000

Custom Molding LTD
Mark Wegmiller
4534 Lake Rd East
Genva, OH

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA
NY

NEDO
PA

Eastgate Dev & Trans Study



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 02-14258

Application Number: 02-14258
APS Premise Number: 0204000438
Permit Fee: **To be entered upon final issuance**
Name of Facility: Custom Molding LTD
Person to Contact: Mark Wegmiller
Address: 4534 Lake Rd East
Genva, OH 44041

Location of proposed air contaminant source(s) [emissions unit(s)]:

**2601 South Ridge
Ashtabula Twp, Ohio**

Description of proposed emissions unit(s):

2 Spray layup molding booths of polyester resin mixes and gelcoat mixes to make fiberglass reinforced plastic parts.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- 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 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 appropriate Ohio EPA District Office or local air agency. 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., 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.)

3. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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

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information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may

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lead to such sanctions

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and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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 prove to be inadequate or cannot meet applicable standards.

10. 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.

11. 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).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the

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permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. 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 this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	16.06

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R001 - Spray layup molding of polyester resin mixes and gelcoat mixes to make fiberglass reinforced plastic parts: layup booth #1	OAC rule 3745-31-05(A)(3)	OC emissions shall not exceed 44 lbs/day and 8.03 tons/year, including cleanup materials.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include the requirements of OAC rules 3745-21-07(G)(2) and 3745-35-07(B) and compliance with the Air Toxic Policy, as specified in sections C.3. through C.6.
	OAC rule 3745-35-07(B)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day, excluding cleanup materials. See sections A.2.a. and A.2.b.
		See section A.2.c.

2. Additional Terms and Conditions

- 2.a The emissions of organic material from the spray lay-up operation consist of styrene and/or methyl methacrylate, which are photochemically reactive materials and hazardous air pollutants (HAPs).
- 2.b Only non-photochemically reactive cleanup materials, that contain no HAPs, shall be employed. A photochemically reactive material is defined by OAC rule 3745-21-01(C)(5)

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and is determined at the time the material is employed. A HAP list is included in section 112(b) of the federal Clean Air Act.

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Emissions Unit ID: **R001**

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- 2.c** Facility wide emissions from R001 and R002 shall not exceed the following limits:
- i. 9.0 tons per year of each single HAP, based upon a rolling, 12-month summation.
 - ii. 24.0 tons per year of total, combined HAPs, based upon a rolling, 12-month summation.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each lay-up material (i.e., polyester resin mix or gelcoat mix) and each cleanup material employed.
 - b. An identification of whether or not each cleanup material employed is a photochemically reactive material, and whether or not each cleanup material employed has any HAPs..
 - c. An identification of whether vapor suppressed or non-vapor suppressed polyester resin mix was employed.
 - d. An identification of the type of mechanical resin application (i.e., uncontrolled atomized spray or non-atomized application) employed.
 - e. The number of pounds of each lay-up material employed.
 - f. The content of each HAP (i.e. styrene or methyl methacrylate) in each lay-up material, in percent by weight.
 - g. The total OC emission rate for all lay-up materials, in pounds per day.
 - h. The volume of each cleanup material employed, in gallons per day.
 - i. The OC content of each cleanup material, in pounds per gallon.
 - j. The total OC emission rate for all lay-up materials and all cleanup materials, in pounds per

day.

- k. The actual number of hours the emissions unit was in operation.
 - l. The average hourly OC emission rate for all lay-up materials, (i.e., (g)/(k)), in pounds per hour (average).
2. The permittee shall keep the following monthly records to ensure compliance with the HAP emission limits:
- a. For each single HAP, the total amount of that HAP emitted (TSHAP) from all layup materials employed in this emissions unit, in ton(s) per month, which is the sum of the daily single HAP emissions, SHAP, as specified in section E.1.b. of this permit for the calendar month, divided by 2000 pounds per ton.
 - b. The total amount of combined HAPs emitted (TCHAP) from layup materials employed in this emissions unit, in tons per month.
 - c. The rolling, 12-month summation of the emissions of each, single HAP from emissions units R001 and R002.
 - d. The rolling, 12-month summation of the emissions of total, combined HAPs from emissions units R001 and R002.
3. Air Toxic Policy Clarifying Language

This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

AIR TOXIC ANALYSIS

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Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$)	Maximum Acceptable Ground Level Concentration (MAGLC), ($\mu\text{g}/\text{m}^3$)
R001 & R002	Styrene	85,200	16	827.6	2,028
R001 & R002	Methyl methacrylate	204,800	16	827.6	4,876
R001 & R002	Acetone	1,187,116	8	413.8	118,712

4. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

5. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

Emissions Unit ID: **R001**

- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

- 6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the lay-up materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the OC emissions from the lay-up materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
 - c. An identification of each day during which the OC emissions from the lay-up materials and the cleanup materials exceeded 44 pounds per day, and the actual OC emissions for each such day.

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- d. An identification of each day during which any photochemically reactive cleanup materials were employed.
 - e. An identification of each day during which any cleanup materials, that have a HAP content, were employed.
 - f. All exceedances of the rolling, 12-month emission limitation for each single HAP.
 - g. All exceedances of the rolling, 12-month emission limitation for total combined HAPs.
2. The permittee shall submit annual reports which summarize the following information:
- a. Emissions of total OC from this emissions unit.
 - b. Emissions of each single HAP from this emissions unit and from the entire facility.
 - c. Emissions of total combined HAPs from this emissions unit and from the entire facility.

The reports shall include the emission calculations for the previous calendar year, and shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the allowable emission limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
- 1.a. Emission Limitation: 8 lbs OC/hr, excluding cleanup emissions.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section C.1.1. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests, performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, as appropriate.
 - 1.b. Emission Limitation: 40 lbs OC/day, excluding cleanup emissions.
 - i. Applicable Compliance Method: Compliance shall be determined based upon the following: Determination of single HAP emissions from the layup materials:

$$SHAPz = \text{summation of } (W_i \times HAPz_EFz).$$

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Emissions Unit ID: **R001**

Where:

SHAP_z = the daily emissions of a single HAP (i.e. styrene or methyl methacrylate) from all lay-up materials, in pounds per day.

i = subscript denoting a specific lay-up material employed

z = subscript denoting a specific HAP.

W_i = the weight of lay-up material "i" employed, in pounds per day.

EF_z = the emission factor for emissions of a specific HAP for lay-up material "i", based on the specific HAP content and mechanical application type, as noted in the UEF table of Technical Discussion of the Unified Emission Factors for Open Molding of Composites, p. 20, April 7, 1999 or any later revisions.

ii. Determination of combined HAP emissions from the layup materials:

CHAP = summation of (SHAP_z).

Where:

CHAP = the daily emissions of all HAPs combined (i.e. styrene and methyl methacrylate) from all lay-up materials, in pounds per day.

1.c. Emission Limitation: 44 lbs OC/day, including cleanup emissions.

i. Applicable Compliance Method: Compliance shall be determined based upon the following: Determination of emissions from the cleanup materials:

$$E(\text{cleanup}) = \text{summation of } (V_i \times OC_i).$$

Where:

$E(\text{cleanup})$ = the OC emissions from all cleanup materials, in pounds per day.

i = subscript denoting a specific cleanup material employed.

V_i = the volume of cleanup material "i" employed, in gallons per day.

OC_i = the OC content of cleanup material "i", in pounds per gallon.

ii. To determine OC emissions from all layup materials and all cleanup materials the permittee shall employ the following formula:

$$E(\text{OC}) = \text{CHAP} + E(\text{cleanup}).$$

Where:

$E(\text{OC})$ = the combined HAP/OC emissions from the lay-up materials and the OC emissions from the cleanup materials, in pounds per day.

1.d. Emission Limitation: 8.03 TPY OC, including cleanup emissions.

Applicable Compliance Method: To determine annual OC emissions from all layup materials and all cleanup materials, compliance shall be based on the sum of the daily OC emission rates, $E(\text{OC})$, as specified in section E.1.c. of this permit for the calendar year, divided by 2000.

2. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:

2.a. Emission Limitation: 9.0 tons per year of each single HAP, based upon a rolling 12-month summation for R001 and R002.

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Applicable Compliance Method: Compliance shall be determined based on the following:
 $TSHAP = [\text{monthly summation of (SHAPz)}_{R001}] + [\text{monthly summation of (SHAPz)}_{R002}]$.

where:

TSHAP = total monthly emissions for a single HAP from all layup materials employed from the entire facility, in tons, based upon the record keeping specified in section C.2.c.

monthly summation of (SHAPz)_{R001} = total monthly emissions for a single HAP from all layup materials employed from emissions unit R001, in tons, based upon the record keeping specified in section C.2.a.

monthly summation of (SHAPz)_{R002} = total monthly emissions for a single HAP from all layup materials employed from emissions unit R002, in tons, based upon the record keeping specified in section C.2.a.

- 2.b. Emission Limitation: 24.0 tons per year of total, combined HAP, based upon a rolling 12-month summation for R001 and R002.

Applicable Compliance Method: Compliance shall be determined based on the following:
 $TCHAP = [\text{monthly summation of (CHAP)}_{R001}] + [\text{monthly summation of (CHAP)}_{R002}]$.

where:

TCHAP = total monthly emissions for all HAPs combined from all layup materials employed from the entire facility, in tons, based upon the record keeping specified in section C.2.d.

monthly summation of (CHAP)_{R001} = total monthly emissions for all HAPs combined from all layup materials employed from emissions unit R001, in tons, based upon the record keeping specified in section C.2.b.

monthly summation of (CHAP)_{R002} = total monthly emissions for all HAPs combined from all layup materials employed from emissions unit R002, in tons, based upon the record keeping specified in section C.2.b.

3. Any determination of OC content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any thinner or viscosity reducer to the material. The permittee shall determine the composition of the material by

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Emissions Unit ID: **R001**

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formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07(B), the following special terms and conditions of this permit to install are federally enforceable: A - E.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R002 - Spray layup molding of polyester resin mixes and gelcoat mixes to make fiberglass reinforced parts; layup booth #2	OAC rule 3745-31-05(A)(3)	OC emissions shall not exceed 44 lbs/day and 8.03 tons/year, including cleanup materials. The requirements of this rule also include the requirements of OAC rules 3745-21-07(G)(2) and 3745-35-07(B) and compliance with the Air Toxic Policy, as specified in sections C.3. through C.6.
	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day, excluding cleanup materials. See sections A.2.a. and A.2.b.
	OAC rule 3745-35-07(B)	See section A.2.c.

2. Additional Terms and Conditions

- 2.a The emissions of organic material from the spray lay-up operation consist of styrene and/or methyl methacrylate, which are photochemically reactive materials and hazardous air pollutants (HAPs).
- 2.b Only non-photochemically reactive cleanup materials, that contain no HAPs, shall be employed. A photochemically reactive material is defined by OAC rule 3745-21-01(C)(5) and is determined at the time the material is employed. A HAP list is included in section

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112(b) of the federal Clean Air Act.

Emissions Unit ID: **R002**

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Emissions Unit ID: **R002**

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- 2.c** Facility wide emissions from R001 and R002 shall not exceed the following limits:
- i. 9.0 tons per year of each single HAP, based upon a rolling, 12-month summation.
 - ii. 24.0 tons per year of total, combined HAPs, based upon a rolling, 12-month summation.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each lay-up material (i.e., polyester resin mix or gelcoat mix) and each cleanup material employed.
 - b. An identification of whether or not each cleanup material employed is a photochemically reactive material, and whether or not each cleanup material employed has any HAPs..
 - c. An identification of whether vapor suppressed or non-vapor suppressed polyester resin mix was employed.
 - d. An identification of the type of mechanical resin application (i.e., uncontrolled atomized spray or non-atomized application) employed.
 - e. The number of pounds of each lay-up material employed.
 - f. The content of each HAP (i.e. styrene or methyl methacrylate) in each lay-up material, in percent by weight.
 - g. The total OC emission rate for all lay-up materials, in pounds per day.
 - h. The volume of each cleanup material employed, in gallons per day.
 - i. The OC content of each cleanup material, in pounds per gallon.
 - j. The total OC emission rate for all lay-up materials and all cleanup materials, in pounds per

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day.

- k. The actual number of hours the emissions unit was in operation.
 - l. The average hourly OC emission rate for all lay-up materials, (i.e., (g)/(k)), in pounds per hour (average).
2. The permittee shall keep the following monthly records to ensure compliance with the HAP emission limits:
- a. For each single HAP, the total amount of that HAP emitted (TSHAP) from all layup materials employed in this emissions unit, in ton(s) per month, which is the sum of the daily single HAP emissions, SHAP, as specified in section E.1.b. of this permit for the calendar month, divided by 2000 pounds per ton.
 - b. The total amount of combined HAPs emitted (TCHAP) from layup materials employed in this emissions unit, in tons per month.
 - c. The rolling, 12-month summation of the emissions of each, single HAP from emissions units R001 and R002.
 - d. The rolling, 12-month summation of the emissions of total, combined HAPs from emissions units R001 and R002.
3. Air Toxic Policy Clarifying Language

This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

AIR TOXIC ANALYSIS

Emissions Unit ID: R002

Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$)	Maximum Acceptable Ground Level Concentration (MAGLC), ($\mu\text{g}/\text{m}^3$)
R001 & R002	Styrene	85,200	16	827.6	2,028
R001 & R002	Methyl methacrylate	204,800	16	827.6	4,876
R001 & R002	Acetone	1,187,116	8	413.8	118,712

4. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

5. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in

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its permit to install; and

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the lay-up materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the OC emissions from the lay-up materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
 - c. An identification of each day during which the OC emissions from the lay-up materials and the cleanup materials exceeded 44 pounds per day, and the actual OC emissions for each such day.

Emissions Unit ID: **R002**

- d. An identification of each day during which any photochemically reactive cleanup materials were employed.
 - e. An identification of each day during which any cleanup materials, that have a HAP content, were employed.
 - f. All exceedances of the rolling, 12-month emission limitation for each single HAP.
 - g. All exceedances of the rolling, 12-month emission limitation for total combined HAPs.
2. The permittee shall submit annual reports which summarize the following information:
- a. Emissions of total OC from this emissions unit.
 - b. Emissions of each single HAP from this emissions unit and from the entire facility.
 - c. Emissions of total combined HAPs from this emissions unit and from the entire facility.

The reports shall include the emission calculations for the previous calendar year, and shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the allowable emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a. Emission Limitation: 8 lbs OC/hr, excluding cleanup emissions.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section C.1.1. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests, performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, as appropriate.
 - 1.b. Emission Limitation: 40 lbs OC/day, excluding cleanup emissions.
 - i. Applicable Compliance Method: Compliance shall be determined based upon the following: Determination of single HAP emissions from the layup materials:

$SHAP_z = \text{summation of } (W_i \times HAP_{z_EFz})$.

Where:

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Emissions Unit ID: R002

SHAP_z = the daily emissions of a single HAP (i.e. styrene or methyl methacrylate) from all lay-up materials, in pounds per day.

i = subscript denoting a specific lay-up material employed

z = subscript denoting a specific HAP.

W_i = the weight of lay-up material "i" employed, in pounds per day.

EF_z = the emission factor for emissions of a specific HAP for lay-up material "i", based on the specific HAP content and mechanical application type, as noted in the UEF table of Technical Discussion of the Unified Emission Factors for Open Molding of Composites, p. 20, April 7, 1999 or any later revisions.

- ii. Determination of combined HAP emissions from the layup materials:

CHAP = summation of (SHAP_z).

Where:

CHAP = the daily emissions of all HAPs combined (i.e. styrene and methyl methacrylate) from all lay-up materials, in pounds per day.

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1.c. Emission Limitation: 44 lbs OC/day, including cleanup emissions.

- i. Applicable Compliance Method: Compliance shall be determined based upon the following: Determination of emissions from the cleanup materials:

$$E(\text{cleanup}) = \text{summation of } (V_i \times OC_i).$$

Where:

$E(\text{cleanup})$ = the OC emissions from all cleanup materials, in pounds per day.

i = subscript denoting a specific cleanup material employed.

V_i = the volume of cleanup material "i" employed, in gallons per day.

OC_i = the OC content of cleanup material "i", in pounds per gallon.

- ii. To determine OC emissions from all layup materials and all cleanup materials the permittee shall employ the following formula:

$$E(\text{OC}) = \text{CHAP} + E(\text{cleanup}).$$

Where:

$E(\text{OC})$ = the combined HAP/OC emissions from the lay-up materials and the OC emissions from the cleanup materials, in pounds per day.

1.d. Emission Limitation: 8.03 TPY OC, including cleanup emissions.

Applicable Compliance Method: To determine annual OC emissions from all layup materials and all cleanup materials, compliance shall be based on the sum of the daily OC emission rates, $E(\text{OC})$, as specified in section E.1.c. of this permit for the calendar year, divided by 2000.

2. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:

2.a. Emission Limitation: 9.0 tons per year of each single HAP, based upon a rolling 12-month summation for R001 and R002.

Emissions Unit ID: **R002**

Applicable Compliance Method: Compliance shall be determined based on the following:
 $TSHAP = [\text{monthly summation of } (SHAPz)_{R001}] + [\text{monthly summation of } (SHAPz)_{R002}]$.

where:

$TSHAP$ = total monthly emissions for a single HAP from all layup materials employed from the entire facility, in tons, based upon the record keeping specified in section C.2.c.

monthly summation of $(SHAPz)_{R001}$ = total monthly emissions for a single HAP from all layup materials employed from emissions unit R001, in tons, based upon the record keeping specified in section C.2.a.

monthly summation of $(SHAPz)_{R002}$ = total monthly emissions for a single HAP from all layup materials employed from emissions unit R002, in tons, based upon the record keeping specified in section C.2.a.

- 2.b. Emission Limitation: 24.0 tons per year of total, combined HAP, based upon a rolling 12-month summation for R001 and R002.

Applicable Compliance Method: Compliance shall be determined based on the following:
 $TCHAP = [\text{monthly summation of } (CHAP)_{R001}] + [\text{monthly summation of } (CHAP)_{R002}]$.

where:

$TCHAP$ = total monthly emissions for all HAPs combined from all layup materials employed from the entire facility, in tons, based upon the record keeping specified in section C.2.d.

monthly summation of $(CHAP)_{R001}$ = total monthly emissions for all HAPs combined from all layup materials employed from emissions unit R001, in tons, based upon the record keeping specified in section C.2.b.

monthly summation of $(CHAP)_{R002}$ = total monthly emissions for all HAPs combined from all layup materials employed from emissions unit R002, in tons, based upon the record keeping specified in section C.2.b.

3. Any determination of OC content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any thinner or viscosity reducer to the material. The permittee shall determine the composition of the material by

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PTI

Emissions Unit ID: **R002**

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formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07(B), the following special terms and conditions of this permit to install are federally enforceable: A - E.

NEW SOURCE REVIEW FORM B

PTI Number: 02-14258 Facility ID: 0204000438

FACILITY NAME Custom Molding LTD

FACILITY DESCRIPTION Spray layup molding of polyester resin mixes and gelcoat mixes to make fiberglass reinforced plastic parts CITY/TWP Asthabula Twp

SIC CODE 3089 SCC CODE 3-08-007-24 EMISSIONS UNIT ID R001

EMISSIONS UNIT DESCRIPTION Spray layup molding of polyester resin mixes and gelcoat mixes to make fiberglass reinforced plastic parts: layup booth #1

DATE INSTALLED ASAP

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment				
PM ₁₀	Unclassified				
Sulfur Dioxide	Attainment				
Organic Compounds - layup	Attainment	3.04 lbs/hr 24.4 lbs/day	3.17	8 lbs/hr 40 lbs/day	
Organic Compounds - total	Attainment	28.4 lbs/day	3.69	44 lbs/day	8.03
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead	Attainment				
Styrene - layup	Unclassified	2.86 lbs/hr 11.44 lbs/day	1.49	8 lbs/hr 40 lbs/day	
Methyl methacrylate- layup	Unclassified	0.38 lb/hr	0.20	8 lbs/hr 40 lbs/day	
Acetone - cleanup	Unclassified	4 lbs/day	0.52	4 lbs/day	

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

NEW SOURCE REVIEW FORM B

PTI Number: 02-14258

Facility ID: 0204000438

FACILITY NAME: Custom Molding LTD

FACI

Emissions Unit ID: **R002**

removed plastic parts

Enter Determination Use of non-photochemically reactive, non-HAP cleanup materials. 8 lbs/hr & 40 lbs/day per OAC rule 3745-21-07(G)(2) for layup mtl. only. 40 lbs/day & 8.03 TPY for total OC emissions, based on 4 lbs/day from acetone cleanup. Rolling, 12-month limit of 9.0 TPY single HAP & rolling, 12-month limit of 24.0 TPY combined HAPs from entire facility to limit MPTE to avoid Title V and 112(g) case-by-case MACT.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Styrene or Methyl methacrylate from layup mtl.; acetone from cleanup mtl.

See pages B1-B6 for dispersion model results for R001 & R002 combined.

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FACI

Emissions Unit ID: **R002**

FACILITY DESCRIPTION Spray layup molding of polyester resin mixes and gelcoat mixes to make fiberglass reinforced plastic parts

CITY/TWP Asthabula Twp

SIC CODE 3089

SCC CODE 3-08-007-24

EMISSIONS UNIT ID R002

EMISSIONS UNIT DESCRIPTION Spray layup molding of polyester resin mixes and gelcoat mixes to make fiberglass reinforced parts; layup booth #2

DATE INSTALLED ASAP

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment				
PM ₁₀	Unclassified				
Sulfur Dioxide	Attainment				
Organic Compounds- layup	Attainment	3.04 lbs/hr 24.4 lbs/day	3.17	8 lbs/hr 40 lbs/day	
Organic Compounds- total	Attainment	28.4 lbs/day	3.69	44 lbs/day	8.03
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead	Attainment				
Styrene - layup	Unclassified	2.86 lbs/hr 11.44 lbs/day	1.49	8 lbs/hr 40 lbs/day	
Methyl methacrylate- layup	Unclassified	0.38 lb/hr	0.20	8 lbs/hr 40 lbs/day	
Acetone- cleanup	Unclassified	4 lbs/day	0.52	4 lbs/day	

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Use of non-photochemically reactive, non-HAP cleanup materials. 8 lbs/hr & 40 lbs/day per OAC rule 3745-21-07(G)(2) for layup mtl. only. 40 lbs/day & 8.03 TPY for total OC emissions, based on 4 lbs/day from acetone cleanup. Rolling, 12-month limit of 9.0 TPY single HAP & rolling, 12-month limit of 24.0 TPY combined HAPs from entire facility to limit MPTE to avoid Title V and 112(g) case-by-case MACT.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to containinants for which the American Conference of Governmental Industrial

NEW SOURCE REVIEW FORM B

PTI Number: 02-14258

Facility ID: 0204000438

FACILITY NAME: Custom Molding LTD

FACI

Emissions Unit ID: **R002**

removes plastic parts

Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*?

X YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: Styrene or methyl methacrylate from layup mtl.; acetone from cleanup mtl.

See pages B1-B6 for dispersion model results for R001 & R002 combined.

34 **NEW**
PTI #
FAC#

Emissions Unit ID: **R002**

CITY/TWP Asthabula Twp

FACILITY DESCRIPTION Spray layup molding of polyester resin mixes and gelcoat mixes to make fiberglass reinforced plastic parts

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input type="checkbox"/>	0000000c.wpd	<input checked="" type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

NONE

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **ENTER PTI NUMBER HERE** 02-14258

A. Source Description This facility manufactures fiberglass reinforced plastic parts. The following emission unit(s) are included in this synthetic minor determination:

(R001 & R002): Spray layup molding of polyester resin mixes and gelcoat mixes to make fiberglass reinforced plastic parts: layup booths #1 & #2.

B. Facility Emissions and Attainment Status: The Ashtabula Township Plant will be a major stationary source for a combination of hazardous air pollutant (HAP) emissions. Ashtabula County is designated as attainment for ozone.

NEW SOURCE REVIEW FORM B

PTI Number: 02-14258

Facility ID: 0204000438

FACILITY NAME Custom Molding LTD

FACI

Emissions Unit ID: **R002**

remolded plastic parts

C. Source Emissions: Maximum emissions (based on SIP rule OAC 3745-21-07(G)(2) schedule) are:

<u>Emission Unit</u>	<u>Maximum Emissions</u>	
	<u>Tons/Year</u>	<u>Tons/Year</u>
<u>VOC/HAP</u>	<u>Total OC</u>	
R001	7.3	8.03
R002	7.3	8.03
Facility total	14.6	16.06

The emission unit will have rolling, 12-month annual limit(s) as shown below.

RESTRICTED POTENTIAL-ALLOWABLE EMISSIONS

<u>Unit</u>	<u>Tons/Year</u>	<u>Tons/Year</u>	<u>Tons/Year</u>
	<u>single HAPs</u>	<u>combined HAPs</u>	<u>Total OC</u>
R001	na	na	8.03
R002	na	na	8.03
Total	9.0	24.0	na

D. Conclusion: The 12-month single HAP emissions will less than 10 TPY and the 12-month combined HAP emissions will be less than 25 TPY, both over rolling periods. With these restrictions PTI 02-14258 will make the facility a synthetic minor source. The facility will not be subject to Title V requirements nor section 112(g) of the Clean Air Act Ammendments.

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	16.06

36 **NEW**
PTI T
FACI

FACILITY DESCRIPTION

Spray layup molding of polyester resin mixes and gelcoat mixes to make fiberglass reinforced plastic parts

Emissions Unit ID: **R002**
CITY/TWP Asthabula Twp