



Environmental
Protection Agency

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

11/10/2010

Brian Linnemann
R L Industries
9355 LE SAINT DR
FAIRFIELD, OH 45014

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1409030581
Permit Number: P0105965
Permit Type: Renewal
County: Butler

Certified Mail

Yes	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) 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, Journal News. 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 Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660

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 Hamilton County Dept. of Environmental Services at (513)946-7777.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
HCDOES; Indiana; Kentucky



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

RL Industries (RL) is an existing manufacturer of reinforced plastic composites products.

This permitting application (P0105965) is for the administrative modification of permit to install (PTI) number 14-05915, issued May 3, 2007, for emissions units P001, P002, P003, P006, P007, P008, P009, P010, and P011 to implement a facility requested voluntary group limitation for volatile organic compound (VOC) emissions. The facility requests that VOC emissions from all reinforced plastic composites production at the facility be limited to 9.9 tons per year (TPY) in order to avoid the requirements of Ohio Administrative Code (OAC) rule 3745-21-25. This is a decrease in overall VOC emissions.

3. Facility Emissions and Attainment Status:

RL is currently a synthetic minor facility based on the potential to emit of hazardous air pollutants (HAP) emissions. The facility has requested federally enforceable restrictions on HAP emissions to avoid Title V operating permit applicability. RL is located in Butler County. Butler County is currently non-attainment of particulate matter 2.5 microns and less in diameter (PM_{2.5}), and attainment for all other criteria pollutants.

4. Source Emissions:

OAC rule 3745-21-25 will not apply to the emissions units in this permit due to the facility requesting a group emission limitation to keep VOC emissions to less than 10 TPY for all reinforced plastic composites production operations, pursuant to OAC rule 3745-21-25(A)(2)(e). This group limitation will result in a decrease in allowable VOC emissions for the group of emissions units.

Air PTI number 14-05915, issued May 3, 2007, included the applicability of OAC rule 3745-21-07(G)(2). Most emissions units had an hourly emission limitation of 8 lbs of organic compound (OC)/hour and 40 lbs of OC/day. These hourly and daily emission limitations based on OAC rule 3745-21-07(G)(2) were removed based on the rule being replaced. Most emissions units also have an annual emission limitation of 7.3 TPY of OC listed under best available technology (BAT) OAC rule 3745-31-05(A)(3). Because this permitting action is an administrative modification, this BAT limitation was carried over from the original PTI and was not re-evaluated.

Since potential OC emissions are greater than 7.3 TPY, a quarterly deviation report for the OC emissions was included in the Reporting Requirements.

The superseded permit PTI 14-05915 was issued in 2007, and contained less than 10 TPY BAT exemptions for VOC and particulate matter (PM)/PM₁₀. This permit was updated to include the language following the most recent BAT guidance dated July 2, 2010 for all emissions units including the less than 10 TPY BAT exemptions (specifically item number 6 with regard to administrative modifications).



OAC rule 3745-31-05(C), as effective 12/1/2006, will apply to emissions units for the group VOC emissions limitation once US EPA approves Ohio's State Implementation Plan (SIP) revision which includes the Ohio's Senate Bill (SB) 265 changes to OAC rule 3745-31-05 since the facility is requesting a voluntary restriction to avoid a state rule (OAC rule 3745-21-25).

Air Toxics were evaluated for all emissions units in this permit during the permit review for PTI number 14-05915, issued May 3, 2007. The Air Toxics language was carried over from the PTI.

5. Conclusion:

With the restrictions listed with OAC rule 3745-31-05(D) of the facility-wide HAP emissions to 9.9 TPY for any individual HAP and 24.9 TPY for all HAP emissions combined, this facility will avoid being subject to Title V operating permit requirements.

With the restrictions listed with OAC rule 3745-31-05(E) to restrict VOC emissions to 9.9 TPY for all reinforced plastic composites production operations at the facility, this facility will avoid being subject to the requirements of OAC rule 3745-21-25.

6. Please provide additional notes or comments as necessary:

Approval of FEPTIO P0105965 is recommended. It is recommended that the permit first be issued in draft, with a comment period, before being issued final.

Table with 3 columns: Permit Fee, PWR, and Fee. Rows include P001 through P011 and a Total row.

(Note: Since this is the first issue PTIO, the permit must be issued as a "Renewal" therefore no fee can be assessed. Otherwise the permit fee should be equal to half of the regular permit fee since it is an administrative modification.)

Prepared by: Amy Kesterman
Date: October 12, 2010

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

Table with 2 columns: Pollutant and Tons Per Year. Rows include OC, VOC, and PE/PM10.

HAP individual	9.9
HAP combined	24.9

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
R L Industries

Issue Date: 11/10/2010

Permit Number: P0105965

Permit Type: Renewal

Permit Description: Facility requested an administrative modification of PTI 14-05915 in order to set a group emissions limitation of 10 TPY VOC to avoid being subject to OAC rule 3745-21-25.

Facility ID: 1409030581

Facility Location: R L Industries
9355 LESAINTE DR.,
FAIRFIELD, OH 45014

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, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. 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 Paul Tedtman at Hamilton County Dept. of Environmental Services, 250 William Howard Taft Pkwy., Cincinnati, OH 45219-2660 or (513)946-7777. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
R L Industries**

Facility ID: 1409030581
Permit Number: P0105965
Permit Type: Renewal
Issued: 11/10/2010
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
R L Industries

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Authorization

Facility ID: 1409030581

Application Number(s): M0000718, M0000847

Permit Number: P0105965

Permit Description: Facility requested an administrative modification of PTI 14-05915 in order to set a group emissions limitation of 10 TPY VOC to avoid being subject to OAC rule 3745-21-25.

Permit Type: Renewal

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

Issue Date: 11/10/2010

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

R L Industries
9355 LESAINTE DR.
FAIRFIELD, OH 45014

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

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

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0105965
Permit Description: Facility requested an administrative modification of PTI 14-05915 in order to set a group emissions limitation of 10 TPY VOC to avoid being subject to OAC rule 3745-21-25.

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

Emissions Unit ID: P001
Company Equipment ID: Filament Winding Equipment with Resin Bath
Superseded Permit Number: 14-05915
General Permit Category and Type: Not Applicable

Emissions Unit ID: P006
Company Equipment ID: Gelcoat Application
Superseded Permit Number: 14-05915
General Permit Category and Type: Not Applicable

Emissions Unit ID: P008
Company Equipment ID: Assembly and Manual Resin Application
Superseded Permit Number: 14-05915
General Permit Category and Type: Not Applicable

Emissions Unit ID: P010
Company Equipment ID: Cowles Resin Mixer
Superseded Permit Number: 14-05915
General Permit Category and Type: Not Applicable

Emissions Unit ID: P011
Company Equipment ID: Plant-wide Cleanup Materials
Superseded Permit Number: 14-05915
General Permit Category and Type: Not Applicable

Group Name: P002 and P003

Emissions Unit ID:	P002
Company Equipment ID:	Spray Resin Layup on Dry Filament Winding
Superseded Permit Number:	14-05915
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	Spray Resin Layup on Taped Filament Winding
Superseded Permit Number:	14-05915
General Permit Category and Type:	Not Applicable

Group Name: P007 and P009 VARTM

Emissions Unit ID:	P007
Company Equipment ID:	Vacuum Assisted Resin Transfer Molding 1
Superseded Permit Number:	14-05915
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P009
Company Equipment ID:	Vacuum Assisted Resin Transfer Molding 2
Superseded Permit Number:	14-05915
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Hamilton County Dept. of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile 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).

while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) 2., 3., 4., and 5.
2. The total allowable emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application), P009 (Vacuum Assisted Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup), all de minimis emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP, as a rolling, 365-day summation, and 24.9 TPY for any combination of HAPs, as a rolling, 365-day summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.
3. The permittee shall collect and record the following information for each day for the emissions units identified in 2. above:
 - a) the company identification for each coating (resin, gel coat, and/or adhesive) employed;
 - b) the amount of each coating (resin, gel coat, and/or adhesive) employed, in pounds;
 - c) the HAP content, recorded in percent weight, of each coating (resin, gel coat, and/or adhesive);
 - d) the total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds per day [for each HAP the product of (b) times (c) times the Composite Fabricators Unified Emission Factors for Open Molding of Composites or the accepted emission factor for each liquid organic material];
 - e) the updated rolling, 365-day summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days;
 - f) the total combined HAP emissions from all liquid organic materials employed, in pounds per day; and
 - g) the updated rolling, 365-day summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current day and the preceding 364 days.

Draft Permit-to-Install and Operate

R L Industries

Permit Number: P0105965

Facility ID: 1409030581

Effective Date: To be entered upon final issuance

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in 2. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June, and July through September, respectively).

5. Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling, 365-day summation for the emissions units listed in 2.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be demonstrated by the record keeping requirements specified in 3.

C. Emissions Unit Terms and Conditions

1. P001, Filament Winding Equipment with Resin Bath

Operations, Property and/or Equipment Description:

Filament Winding Equipment with Resin Bath

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. d)(4) and e)(2).
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)b.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(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 are identified below. 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)	Organic compound emissions shall not exceed 7.3 tons per year. The requirements of this rule include compliance with OAC rule 3745-31-05(D). See c)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid 40 CFR Part 63 Subpart WWWW and Title V Permitting	See Sections B.2., B.3., B.4., and B.5. For purposes of federal major stationary source applicability determinations, all annual organic compound emissions are considered volatile organic compound emissions.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Volatile organic compound (VOC) emissions shall not exceed 17.1 pounds per hour. See b)(2)c.
d.	OAC rule 3745-31-05(E), as	See b)(2)b. and b)(2)d.

Draft Permit-to-Install and Operate

R L Industries

Permit Number: P0105965

Facility ID: 1409030581

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	effective 12/1/2006	
e.	OAC rule 3745-21-25	Exempt pursuant to OAC rule 3745-21-25(A)(2)(e). See b)(2)b.

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations.
- b. The total allowable emissions of volatile organic compounds (VOC) from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat Application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application) - except application of surface preparation coatings, P009 (Vacuum Assisted Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup), and all other existing and future to-be-installed reinforced plastic composites production operations [as defined in OAC rule 3745-21-01(GG)], combined, excluding operations specifically excluded from the requirements of OAC rule 3745-21-25 [as defined in OAC rule 3745-21-25(C)(2)], shall not exceed 9.9 tons per year (TPY), as a rolling, 12-month summation.
- c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source since the calculated annual emission rate for VOC is less than ten tons per year, taking into account the voluntary restriction as listed in b)(2)b. to avoid requirements of OAC rule 3745-21-25.

- e. The hourly emission limitation for VOC is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.

c) Operational Restrictions

- (1) The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for the coating operation:

- a. the company identification for each coating (resin or gel coat) employed;
- b. the amount of each coating (resin or gel coat) employed, in pounds;
- c. the organic compound content, recorded in percent weight, of each coating (resin or gel coat); and
- d. the total organic compound emission rate from all coatings (resin and gel coat), in pounds per month [the summation of (b. x c.) x (emission factor found in the Composite Fabricators Association Unified Emission Factors for Open Molding of Composites) for all resins and gel coats employed during the month].

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- (2) The permittee shall summarize the emissions from the records maintained in d)(1) on a monthly basis and shall total the emissions at the end of the calendar year.

- (3) The permittee shall collect and record the following information for each month for the emissions units identified in b)(2)b. above:

- a. the company identification for each coating (resin, gel coat, and/or adhesive) employed;
- b. the amount of each coating (resin, gel coat, and/or adhesive) employed, in pounds;
- c. the VOC content, recorded in percent weight, of each coating (resin, gel coat, and/or adhesive);
- d. the total VOC emissions from all liquid organic materials employed, in pounds per month [the product of b. times c. times the Composite Fabricators Unified Emission Factors for Open Molding of Composites or the accepted emissions factor for each liquid organic material]; and
- e. the updated rolling, 12-month summation of VOC emissions, in pounds or tons. This shall include the information for the current month and the preceding 11 months.

- (4) The federally enforceable permit to install and operate for these emissions units P001, P002, P003, P006 through P011 were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application and the supplemental information after submittal of the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85.2

Maximum Hourly Emission Rate (lbs/hr): 44.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500

MAGLC (ug/m3): 2024

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. VOC emission limitation outlined in b)(2)b.;
 - ii. OC emission limitation outlined in b)(1)a.; and
 - iii. HAP emission limitation outlined in Section B.2.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
 - (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
 - (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
- (1) Compliance with the emission limitations specified in b)(1) and b)(2) shall be determined by the following methods:

a. Emission Limitation:

7.3 TPY of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitation shall be determined by the record keeping requirements specified in d)(1) and d)(2).

b. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 17.1 pounds per hour.

Applicable Compliance Method:

The hourly emission limitation is based upon the emissions unit's potential to emit. Potential hourly VOC emissions were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-05915 as submitted on January 16, 2007:

$$\text{VOC} = [(150 \text{ lbs of styrene resin/hr}) \times (0.23 \text{ styrene VOC content}) \times (0.1843 \text{ EF for amount emitted})] + [(150 \text{ lbs of MMA resin/hr}) \times (0.23 \text{ MMA VOC content}) \times (0.3105 \text{ EF for amount emitted})] = 17.1 \text{ pounds per hour.}$$

c. Emission Limitation:

9.9 TPY of VOC emissions, based on a rolling, 12-month summation for the emissions units listed in b)(2)b.

Applicable Compliance Method:

Compliance with the VOC emission limitation shall be demonstrated by the record keeping requirements specified in d)(3).

- (2) Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC and VOC contents of the materials employed in this emissions unit.

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05915, as issued on May 3, 2007, for this emissions unit.

2. P006, Gelcoat Application

Operations, Property and/or Equipment Description:

Gelcoat Application

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

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

a. d)(4) and e)(2).

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

a. b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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)	Organic compound emissions shall not exceed 7.3 tons per year. The requirements of this rule include compliance with OAC rule 3745-31-05(D). See c)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid 40 CFR Part 63 Subpart WWWW and Title V permitting	See Sections B.2., B.3., B.4., and B.5. For purposes of federal major stationary source applicability determinations, all annual organic compound emissions are considered volatile organic compound emissions.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Volatile organic compound (VOC) emissions shall not exceed 8.25 pounds per hour. See b)(2)c.
d.	OAC rule 3745-31-05(E), as	See b)(2)b. and b)(2)d.

Draft Permit-to-Install and Operate

R L Industries

Permit Number: P0105965

Facility ID: 1409030581

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	effective 12/1/2006	
e.	OAC rule 3745-21-25	Exempt pursuant to OAC rule 3745-21-25(A)(2)(e). See b)(2)b.

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations.
- b. The total allowable emissions of volatile organic compounds (VOC) from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat Application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application) - except application of surface preparation coatings, P009 (Vacuum Assisted Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup), and all other existing and future to-be-installed reinforced plastic composites production operations [as defined in OAC rule 3745-21-01(GG)], combined, excluding operations specifically excluded from the requirements of OAC rule 3745-21-25 [as defined in OAC rule 3745-21-25(C)(2)], shall not exceed 9.9 tons per year (TPY), as a rolling, 12-month summation.
- c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source since the calculated annual emission rate for VOC is less than ten tons per year, taking into account the voluntary restriction as listed in b)(2)b. to avoid requirements of OAC rule 3745-21-25.

- e. The hourly emission limitation for VOC is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.

c) Operational Restrictions

- (1) The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for the coating operation:

- a. the company identification for each coating (resin or gel coat) employed;
- b. the amount of each coating (resin or gel coat) employed, in pounds;
- c. the organic compound content, recorded in percent weight, of each coating (resin or gel coat); and
- d. the total organic compound emission rate from all coatings (resin and gel coat), in pounds per month [the summation of (b. x c.) x (emission factor found in the Composite Fabricators Association Unified Emission Factors for Open Molding of Composites) for all resins and gel coats employed during the month].

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- (2) The permittee shall summarize the emissions from the records maintained in d)(1) on a monthly basis and shall total the emissions at the end of the calendar year.

- (3) The permittee shall collect and record the following information for each month for the emissions units identified in b)(2)b. above:

- a. the company identification for each coating (resin, gel coat, and/or adhesive) employed;
- b. the amount of each coating (resin, gel coat, and/or adhesive) employed, in pounds;
- c. the VOC content, recorded in percent weight, of each coating (resin, gel coat, and/or adhesive);
- d. the total VOC emissions from all liquid organic materials employed, in pounds per month [the product of b. times c. times the Composite Fabricators Unified Emission Factors for Open Molding of Composites or the accepted emissions factor for each liquid organic material]; and
- e. the updated rolling, 12-month summation of VOC emissions, in pounds or tons. This shall include the information for the current month and the preceding 11 months.

- (4) The federally enforceable permit to install and operate for these emissions units P001, P002, P003, P006 through P011 were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application and the supplemental information after submittal of the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85.2

Maximum Hourly Emission Rate (lbs/hr): 44.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500

MAGLC (ug/m3): 2024

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. VOC emission limitation outlined in b)(2)b.;
 - ii. OC emission limitation outlined in b)(1)a.; and
 - iii. HAP emission limitation outlined in Section B.2.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
 - (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
 - (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
- (1) Compliance with the emission limitations specified in b)(1) and b)(2) shall be determined by the following methods:

a. Emission Limitation:

7.3 TPY of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitation shall be determined by the record keeping requirements specified in d)(1) and d)(2).

b. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 8.25 pounds per hour.

Applicable Compliance Method:

The hourly emission limitation is based upon the emissions unit's potential to emit. Potential hourly VOC emissions were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-05915 as submitted on January 16, 2007:

$$\text{VOC} = [(30 \text{ lbs of styrene resin/hr}) \times (0.23 \text{ styrene VOC content}) \times (0.4451 \text{ EF for amount emitted})] + [(30 \text{ lbs of MMA resin/hr}) \times (0.23 \text{ MMA VOC content}) \times (0.75 \text{ EF for amount emitted})] = 8.25 \text{ pounds per hour.}$$

c. Emission Limitation:

9.9 TPY of VOC emissions, based on a rolling, 12-month summation for the emissions units listed in b)(2)b.

Applicable Compliance Method:

Compliance with the VOC emission limitation shall be demonstrated by the record keeping requirements specified in d)(3).

(2) Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC contents of the materials employed in this emissions unit.

g) Miscellaneous Requirements

(1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05915, as issued on May 3, 2007, for this emissions unit.

3. P008, Assembly and Manual Resin Application

Operations, Property and/or Equipment Description:

Assembly and Manual resin Application

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

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

a. d)(4) and e)(2).

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

a. b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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)	Organic compound emissions shall not exceed 7.3 tons per year. The requirements of this rule include compliance with OAC rule 3745-31-05(D). See c)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid 40 CFR Part 63 Subpart WWWW and Title V Permitting	See Sections B.2., B.3., B.4., and B.5. For purposes of federal major stationary source applicability determinations, all annual organic compound emissions are considered volatile organic compound emissions.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Volatile organic compound (VOC) emissions shall not exceed 20.3 pounds per hour. See b)(2)c.
d.	OAC rule 3745-31-05(E), as	See b)(2)b. and b)(2)d.

Draft Permit-to-Install and Operate

R L Industries

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	effective 12/1/2006	
e.	OAC rule 3745-21-25	Exempt, pursuant to OAC rule 3745-21-25(A)(2)(e). See b)(2)b.

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations.
- b. The total allowable emissions of volatile organic compounds (VOC) from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat Application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application) - except application of surface preparation coatings, P009 (Vacuum Assisted Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup), and all other existing and future to-be-installed reinforced plastic composites production operations [as defined in OAC rule 3745-21-01(GG)], combined, excluding operations specifically excluded from the requirements of OAC rule 3745-21-25 [as defined in OAC rule 3745-21-25(C)(2)], shall not exceed 9.9 tons per year (TPY), as a rolling, 12-month summation.
- c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source since the calculated annual emission rate for VOC is less than ten tons per year, taking into account the voluntary restriction as listed in b)(2)b. to avoid requirements of OAC rule 3745-21-25.

- e. The hourly emission limitation for VOC is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.

c) Operational Restrictions

- (1) The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for the coating operation:

- a. the company identification for each coating (resin or gel coat) employed;
- b. the amount of each coating (resin or gel coat) employed, in pounds;
- c. the organic compound content, recorded in percent weight, of each coating (resin or gel coat); and
- d. the total organic compound emission rate from all coatings (resin, gel coat and adhesives), in pounds per month [the summation of (b./2000 pounds/ton) x (emission factor found in the Composite Fabricators Association Unified Emission Factors for Open Molding of Composites) for all resins and gel coats employed during the month. For adhesives, the emission factor is 0.05 lb emitted/lb of OC used].

[Note: The coating/adhesive information must be for the materials as employed, including any thinning solvents added at the emissions unit.]

- (2) The permittee shall summarize the emissions from the records maintained in d)(1) on a monthly basis and shall total the emissions at the end of the calendar year.

- (3) The permittee shall collect and record the following information for each month for the emissions units identified in b)(2)b. above:

- a. the company identification for each coating (resin, gel coat, and/or adhesive) employed;
- b. the amount of each coating (resin, gel coat, and/or adhesive) employed, in pounds;
- c. the VOC content, recorded in percent weight, of each coating (resin, gel coat, and/or adhesive);
- d. the total VOC emissions from all liquid organic materials employed, in pounds per month [the product of b. times c. times the Composite Fabricators Unified Emission Factors for Open Molding of Composites or the accepted emission factors for each liquid organic material]; and

- e. the updated rolling, 12-month summation of VOC emissions, in pounds or tons. This shall include the information for the current month and the preceding 11 months.

- (4) The federally enforceable permit to install and operate for these emissions units P001, P002, P003, P006 through P011 were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application and the supplemental information after submittal of the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85.2

Maximum Hourly Emission Rate (lbs/hr): 44.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500

MAGLC (ug/m3): 2024

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. VOC emission limitation outlined in b)(2)b.;
 - ii. OC emission limitation outlined in b)(1)a.; and
 - iii. HAP emission limitation outlined in Section B.2.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

(1) Compliance with the emission limitations specified in b)(1) and b)(2) shall be determined by the following methods:

a. Emission Limitation:

7.3 TPY of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitation shall be determined by the record keeping requirements specified in d)(1) and d)(2).

b. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 20.3 pounds per hour.

Applicable Compliance Method:

The hourly emission limitation is based upon the emissions unit's potential to emit. Potential hourly VOC emissions were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-05915 as submitted on January 16, 2007:

$$\text{VOC} = [(150 \text{ lbs of styrene resin/hr}) \times (0.23 \text{ styrene VOC content}) \times (0.1257 \text{ EF for amount emitted})] + [(150 \text{ lbs of MMA resin/hr}) \times (0.23 \text{ MMA VOC content}) \times (0.2118 \text{ EF for amount emitted})] + [(20 \text{ lbs of adhesive/hr}) \times (0.65 \text{ MMA VOC content}) \times (0.05 \text{ EF for amount emitted})] + [(10 \text{ lbs of prep coat/hr}) \times (0.80 \text{ VOC content}) \times (1.0 \text{ EF for amount emitted})] = 20.3 \text{ pounds per hour.}$$

c. Emission Limitation:

9.9 TPY of VOC emissions, based on a rolling, 12-month summation for the emissions units listed in b)(2)b.

Applicable Compliance Method:

Compliance with the VOC emission limitation shall be demonstrated by the record keeping requirements specified in d)(3).

(2) Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC and VOC contents of the materials employed in this emissions unit.

g) Miscellaneous Requirements

(1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05915, as issued on May 3, 2007, for this emissions unit.

4. P010, Cowles Resin Mixer

Operations, Property and/or Equipment Description:

Cowles Resin Mixer

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

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

a. d)(4) and e)(2).

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

a. b)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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)	Organic compound emissions shall not exceed 132.5 pounds per day and 24.18 tons per year. The requirements of this rule include compliance with OAC rule 3745-31-05(D).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
c.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 4.10 pounds per hour.
d.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid 40 CFR Part 63 Subpart WWWW and Title V Permitting	See Sections B.2., B.3., B.4., and B.5. For purposes of federal major stationary source applicability determinations, all annual organic compound emissions are considered volatile organic compound emissions.
e.	OAC rule 3745-31-05(A)(3), as	Volatile organic compound (VOC)

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	effective 11/30/2001	emissions shall not exceed 14.7 pounds per hour. Particulate emissions (PE) and particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 2.0 pounds per hour and 8.76 tons per year (TPY). See b)(2)c.
f.	OAC rule 3745-31-05(E), as effective 12/1/2006	See b)(2)b. and b)(2)d.
g.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006	See b)(2)e.
h.	OAC rule 3745-21-25	Exempt pursuant to OAC rule 3745-21-25(A)(2)(e). See b)(2)b.

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations.
- b. The total allowable emissions of volatile organic compounds (VOC) from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat Application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application) - except application of surface preparation coatings, P009 (Vacuum Assisted Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup), and all other existing and future to-be-installed reinforced plastic composites production operations [as defined in OAC rule 3745-21-01(GG)], combined, excluding operations specifically excluded from the requirements of OAC rule 3745-21-25 [as defined in OAC rule 3745-21-25(C)(2)], shall not exceed 9.9 tons per year (TPY), as a rolling, 12-month summation.
- c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source since the calculated annual emission rate for VOC is less than ten tons per year, taking into account the voluntary restriction as listed in b)(2)b. to avoid requirements of OAC rule 3745-21-25.

- e. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) and particulate matter less than 10 microns in diameter (PM10) emissions from this air contaminant source since the uncontrolled potential to emit for PE and PM10 is less than ten tons per year.

- f. The hourly emission limitations for VOC, PE, and PM10, and the annual emissions limitation for PE and PM10 are based upon the emissions unit's potential to emit. Therefore, no hourly VOC, PE, and PM10 records, or annual PE and PM10 records are required to demonstrate compliance with this limitation.

c) **Operational Restrictions**

- (1) The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

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

- (1) The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each resin mixed;
 - b. the amount of each resin mixed, in pounds;
 - c. the organic compound content, recorded in percent weight, of each resin; and
 - d. the total organic compound emission rate from all resin, in pounds per day [the summation of (b. x c.) x (emission factor of 0.005 lb emitted per lb of OC mixed) for all resins mixed during the day].

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- (2) The permittee shall summarize the emissions from the records maintained in d)(1) on a monthly basis and shall total the emissions at the end of the calendar year.
- (3) The permittee shall collect and record the following information for each month for the emissions units identified in b)(2)b. above:
 - a. the company identification for each coating (resin, gel coat, and/or adhesive) employed;
 - b. the amount of each coating (resin, gel coat, and/or adhesive) employed, in pounds;
 - c. the VOC content, recorded in percent weight, of each coating (resin, gel coat, and/or adhesive);
 - d. the total VOC emissions from all liquid organic materials employed, in pounds per month [the product of b. times c. times the Composite Fabricators Unified Emission Factors for Open Molding of Composites or the accepted emissions factor for each liquid organic material]; and
 - e. the updated rolling, 12-month summation of VOC emissions, in pounds or tons. This shall include the information for the current month and the preceding 11 months.
- (4) The federally enforceable permit to install and operate for these emissions units P001, P002, P003, P006 through P011 were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application and the supplemental information after submittal of the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85.2

Maximum Hourly Emission Rate (lbs/hr): 44.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500

MAGLC (ug/m3): 2024

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes

that can affect the parameters used in applying the “Air Toxic Policy” include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists’ (ACGIH’s) handbook entitled “TLVs and BEIs” (“Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices”);
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. VOC emission limitation outlined in b)(2)b.; and
 - ii. HAP emission limitation outlined in Section B.2.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no

changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the emission limitations specified in b)(1) and b)(2) shall be determined by the following methods:

- a. Emission Limitation:

- 132.5 lbs/day of OC emissions from coatings in this emissions unit.

- Applicable Compliance Method:

- Compliance with the OC emission limitation shall be determined by the record keeping requirements specified in d)(1).

- b. Emission Limitation:

- 24.18 TPY of OC emissions from coatings in this emissions unit.

- Applicable Compliance Method:

- Compliance with the OC emission limitation shall be determined by the record keeping requirements specified in d)(1) and d)(2).

- c. Emission Limitation:

- Volatile organic compound (VOC) emissions shall not exceed 14.7 pounds per hour.

- Applicable Compliance Method:

- The hourly emission limitation is based upon the emissions unit's potential to emit. Potential hourly VOC emissions were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-05915 as submitted on January 16, 2007:

- $$\text{VOC} = (8000 \text{ lbs resin mixed/hr}) \times (0.368 \text{ styrene or MMA content}) \times (0.005 \text{ EF for amount emitted}) = 14.7 \text{ pounds per hour.}$$

d. Emission Limitation:

Particulate emissions (PE) and particulate matter less than 10 microns in diameter (PM10) emissions shall not exceed 2.0 pounds per hour and 8.76 tons per year (TPY).

Applicable Compliance Method:

The hourly emission limitation is based upon the emissions unit's potential to emit. Potential hourly PE/PM10 emissions were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-05915 as submitted on January 16, 2007:

$$\text{PE/PM10} = (2000 \text{ lbs filler mixed/hr}) \times (0.001 \text{ EF for amount emitted}) = 2.0 \text{ pounds per hour.}$$

The annual emission limitation is based upon the emissions unit's potential to emit. Potential annual PE/PM10 emissions were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-05915 as submitted on January 16, 2007:

$$\text{PE/PM10} = (2000 \text{ lbs filler mixed/hr}) \times (0.001 \text{ EF for amount emitted}) \times (8760 \text{ hrs/year}) / (2000 \text{ lbs/ton}) = 8.76 \text{ tons per year.}$$

e. Emission Limitation:

9.9 TPY of VOC emissions, based on a rolling, 12-month summation for the emissions units listed in b)(2)b.

Applicable Compliance Method:

Compliance with the VOC emission limitation shall be demonstrated by the record keeping requirements specified in d)(3).

- (2) Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC and VOC contents of the materials employed in this emissions unit.

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05915, as issued on May 3, 2007, for this emissions unit.

5. P011, Plant-wide Cleanup Materials

Operations, Property and/or Equipment Description:

Plantwide Cleanup

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

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

a. d)(3) and e)(2).

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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)	Organic compound emissions shall not exceed 3900 pounds per month and 23.36 tons per year.
b.	OAC rule 3745-21-25	Exempt pursuant to OAC rule 3745-21-25(A)(2)(e). See b)(2)b.

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the mass emission limitations.

b. The total allowable emissions of volatile organic compounds (VOC) from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat Application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application) - except application of surface preparation coatings, P009 (Vacuum Assisted

Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup), and all other existing and future to-be-installed reinforced plastic composites production operations [as defined in OAC rule 3745-21-01(GG)], combined, excluding operations specifically excluded from the requirements of OAC rule 3745-21-25 [as defined in OAC rule 3745-21-25(C)(2)], shall not exceed 9.9 tons per year (TPY), as a rolling, 12-month summation.

c) Operational Restrictions

- (1) The permittee shall not employ any hazardous air pollutants or volatile organic compounds in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for plant wide cleanup:
 - a. The company identification for each cleanup material employed:
 - b. The amount of each cleanup material employed, in pounds; and
 - c. The total organic compound emission rate from all cleanup materials.

These records shall be summarized at the end of each calendar year.

- (2) The permittee shall collect and record the following information for each month for the emissions units identified in b)(2)b. above:
 - a. the company identification for each coating (resin, gel coat, and/or adhesive) employed;
 - b. the amount of each coating (resin, gel coat, and/or adhesive) employed, in pounds;
 - c. the VOC content, recorded in percent weight, of each coating (resin, gel coat, and/or adhesive);
 - d. the total VOC emissions from all liquid organic materials employed, in pounds per month [the product of b. times c. times the Composite Fabricators Unified Emission Factors for Open Molding of Composites or the accepted emissions factor for each liquid organic material]; and
 - e. the updated rolling, 12-month summation of VOC emissions, in pounds or tons. This shall include the information for the current month and the preceding 11 months.

- (3) The federally enforceable permit to install and operate for these emissions units P001, P002, P003, P006 through P011 were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application and supplemental information after submittal of the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic

pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the “worst case” pollutant(s):

Pollutant: Acetone

TLV (ug/m3): 1,188

Maximum Hourly Emission Rate (lbs/hr): 44.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,500

MAGLC (ug/m3): 28,285

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the “Air Toxic Policy” include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists’ (ACGIH’s) handbook entitled “TLVs and BEIs” (“Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices”);
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. VOC emission limitation outlined in b)(2)b.
- b. the probable cause of each deviation (excursion);

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- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) **Testing Requirements**

- (1) Compliance with the emission limitations specified in b)(1) and b)(2) shall be determined by the following methods:
 - a. **Emission Limitations:**

3900 lbs/month of OC emissions and 23.36 tpy from cleanup materials in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitations shall be determined by the record keeping requirements specified in d)(1).
 - b. **Emission Limitation:**

9.9 TPY of VOC emissions, based on a rolling, 12-month summation for the emissions units listed in b)(2)b.

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Applicable Compliance Method:

Compliance with the VOC emission limitation shall be demonstrated by the record keeping requirements specified in d)(2).

- (2) Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC contents of the materials employed in this emissions unit.

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05915, as issued on May 3, 2007, for this emissions unit.

6. Emissions Unit Group - P002 and P003: P002, P003,

EU ID	Operations, Property and/or Equipment Description
P002	Spray Resin Layup on Dry Filament Winding
P003	Spray Resin Layup on Taped Filament Winding

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

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

a. d)(4) and e)(2).

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

a. b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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)	Organic compound emissions shall not exceed 7.3 tons per year. The requirements of this rule include compliance with OAC rule 3745-31-05(D). See c)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid 40 CFR Part 63 Subpart WWWW and Title V permitting	See Sections B.2., B.3., B.4., and B.5. For purposes of federal major stationary source applicability determinations, all annual organic compound emissions are considered volatile organic compound emissions.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Volatile organic compound (VOC) emissions shall not exceed 9.91 pounds per hour. See b)(2)c.

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(E), as effective 12/1/2006	See b)(2)b. and b)(2)d.
e.	OAC rule 3745-21-25	Exempt pursuant to OAC rule 3745-21-25(A)(2)(e). See b)(2)b.

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations.
- b. The total allowable emissions of volatile organic compounds (VOC) from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat Application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application) - except application of surface preparation coatings, P009 (Vacuum Assisted Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup), and all other existing and future to-be-installed reinforced plastic composites production operations [as defined in OAC rule 3745-21-01(GG)], combined, excluding operations specifically excluded from the requirements of OAC rule 3745-21-25 [as defined in OAC rule 3745-21-25(C)(2)], shall not exceed 9.9 tons per year (TPY), as a rolling, 12-month summation.
- c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source since the calculated annual emission rate for VOC is less than ten tons per year, taking into account the voluntary restriction as listed in b)(2)b. to avoid requirements of OAC rule 3745-21-25.

- e. The hourly emission limitation for VOC is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.

c) Operational Restrictions

- (1) The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for the coating operation:

- a. the company identification for each coating (resin or gel coat) employed;
- b. the amount of each coating (resin or gel coat) employed, in pounds;
- c. the organic compound content, recorded in percent weight, of each coating (resin or gel coat); and
- d. the total organic compound emission rate from all coatings (resin and gel coat), in pounds per month [the summation of (b. x c.) x (emission factor found in the Composite Fabricators Association Unified Emission Factors for Open Molding of Composites) for all resins and gel coats employed during the month].

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- (2) The permittee shall summarize the emissions from the records maintained in d)(1) on a monthly basis and shall total the emissions at the end of the calendar year.

- (3) The permittee shall collect and record the following information for each month for the emissions units identified in b)(2)b. above:

- a. the company identification for each coating (resin, gel coat, and/or adhesive) employed;
- b. the amount of each coating (resin, gel coat, and/or adhesive) employed, in pounds;
- c. the VOC content, recorded in percent weight, of each coating (resin, gel coat, and/or adhesive);
- d. the total VOC emissions from all liquid organic materials employed, in pounds per month [the product of b. times c. times the Composite Fabricators Unified Emission Factors for Open Molding of Composites or the accepted emission factor for each liquid organic material]; and
- e. the updated rolling, 12-month summation of VOC emissions, in pounds or tons. This shall include the information for the current month and the preceding 11 months.

- (4) The federally enforceable permit to install and operate for these emissions units P001, P002, P003, P006 through P011 were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application and the supplemental information after submittal of the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85.2

Maximum Hourly Emission Rate (lbs/hr): 44.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500

MAGLC (ug/m3): 2024

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. VOC emission limitation outlined in b)(2)b.;
 - ii. OC emission limitation outlined in b)(1)a.; and
 - iii. HAP emission limitation outlined in Section B.2.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
 - (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
 - (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
- (1) Compliance with the emission limitations specified in b)(1) and b)(2) shall be determined by the following methods:

a. Emission Limitation:

7.3 TPY of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitation shall be determined by the record keeping requirements specified in d)(1) and d)(2).

b. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 9.91 pounds per hour.

Applicable Compliance Method:

The hourly emission limitation is based upon the emissions unit's potential to emit. Potential hourly VOC emissions were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-05915 as submitted on January 16, 2007:

$$\text{VOC} = [(150 \text{ lbs of styrene resin/hr}) \times (0.23 \text{ styrene VOC content}) \times (0.1070 \text{ EF for amount emitted})] + [(150 \text{ lbs of MMA resin/hr}) \times (0.23 \text{ MMA VOC content}) \times (0.1803 \text{ EF for amount emitted})] = 9.91 \text{ pounds per hour.}$$

c. Emission Limitation:

9.9 TPY of VOC emissions, based on a rolling, 12-month summation for the emissions units listed in b)(2)b.

Applicable Compliance Method:

Compliance with the VOC emission limitation shall be demonstrated by the record keeping requirements specified in d)(3).

(2) Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC and VOC contents of the materials employed in this emissions unit.

g) Miscellaneous Requirements

(1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05915, as issued on May 3, 2007, for this emissions unit.

7. Emissions Unit Group - P007 and P009 VARTM: P007, P009,

EU ID	Operations, Property and/or Equipment Description
P007	Vacuum Assisted Resin Transfer Molding 1
P009	Vacuum Assisted resin Transfer Molding 2

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

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

a. d)(4) and e)(2).

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

a. b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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)	Organic compound emissions shall not exceed 7.3 tons per year. The requirements of this rule include compliance with OAC rule 3745-31-05(D). See c)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid 40 CFR Part 63 Subpart WWWW and Title V Permitting	See Sections B.2., B.3., B.4., and B.5. For purposes of federal major stationary source applicability determinations, all annual organic compound emissions are considered volatile organic compound emissions.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Volatile organic compound (VOC) emissions shall not exceed 11.04 pounds per hour. See b)(2)c.

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(E), as effective 12/1/2006	See b)(2)b. and b)(2)d.
e.	OAC rule 3745-21-25	Exempt pursuant to OAC rule 3745-21-25(A)(2)(e). See b)(2)b.

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations.
- b. The total allowable emissions of volatile organic compounds (VOC) from emissions units P001 (Filament Winding Equipment with Resin Bath), P002 (Spray Resin Layup on Dry Filament Winding), P003 (Spray Resin Layup on Taped Filament Winding), P006 (Gelcoat Application), P007 (Vacuum Assisted Resin Transfer Molding 1), P008 (Assembly and Manual Resin Application) - except application of surface preparation coatings, P009 (Vacuum Assisted Resin Transfer Molding 2), P010 (Cowles Resin Mixer), P011 (Plant-wide Cleanup), and all other existing and future to-be-installed reinforced plastic composites production operations [as defined in OAC rule 3745-21-01(GG)], combined, excluding operations specifically excluded from the requirements of OAC rule 3745-21-25 [as defined in OAC rule 3745-21-25(C)(2)], shall not exceed 9.9 tons per year (TPY), as a rolling, 12-month summation.
- c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source since the calculated annual emission rate for VOC is less than ten tons per year, taking into account the voluntary restriction as listed in b)(2)b. to avoid requirements of OAC rule 3745-21-25.

- e. The hourly emission limitation for VOC is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.

c) Operational Restrictions

- (1) The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for the coating operation:

- a. the company identification for each coating (resin or gel coat) employed;
- b. the amount of each coating (resin or gel coat) employed, in pounds;
- c. the organic compound content, recorded in percent weight, of each coating (resin or gel coat); and
- d. the total organic compound emission rate from all coatings (resin and gel coat), in pounds per month [the summation of (b. x c.) x (emission factor of 0.02 lb emitted per lb employed) for all resins and gel coats employed during the month].

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- (2) The permittee shall summarize the emissions from the records maintained in d)(1) on a monthly basis and shall total the emissions at the end of the calendar year.

- (3) The permittee shall collect and record the following information for each month for the emissions units identified in b)(2)b. above:

- a. the company identification for each coating (resin, gel coat, and/or adhesive) employed;
- b. the amount of each coating (resin, gel coat, and/or adhesive) employed, in pounds;
- c. the VOC content, recorded in percent weight, of each coating (resin, gel coat, and/or adhesive);
- d. the total VOC emissions from all liquid organic materials employed, in pounds per month [the product of b. times c. times the Composite Fabricators Unified Emission Factors for Open Molding of Composites or the accepted emission factor for each liquid organic material]; and
- e. the updated rolling, 12-month summation of VOC emissions, in pounds or tons. This shall include the information for the current month and the preceding 11 months.

- (4) The federally enforceable permit to install and operate for these emissions units P001, P002, P003, P006 through P011 were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application and the supplemental information after submittal of the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85.2

Maximum Hourly Emission Rate (lbs/hr): 44.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1500

MAGLC (ug/m3): 2024

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. VOC emission limitation outlined in b)(2)b;
 - ii. OC emission limitation outlined in b)(1)a.; and
 - iii. HAP emission limitation outlined in Section B.2.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
 - (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
 - (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
- (1) Compliance with the emission limitations specified in b)(1) and b)(2) shall be determined by the following methods:

a. Emission Limitation:

7.3 TPY of OC emissions from coatings in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emission limitation shall be determined by the record keeping requirements specified in d)(1) and d)(2).

b. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 11.04 pounds per hour.

Applicable Compliance Method:

The hourly emission limitation is based upon the emissions unit's potential to emit. Potential hourly VOC emissions were determined based on the following equation from the permittee-supplied information in FEPTIO application 14-05915 as submitted on January 16, 2007:

$$\text{VOC} = (1200 \text{ lbs of styrene resin/hr}) \times (0.46 \text{ styrene VOC content}) \times (0.02 \text{ EF for amount emitted}) = 11.04 \text{ pounds per hour.}$$

c. Emission Limitation:

9.9 TPY of VOC emissions, based on a rolling, 12-month summation for the emissions units listed in b)(2)b.

Applicable Compliance Method:

Compliance with the VOC emission limitation shall be demonstrated by the record keeping requirements specified in d)(3).

(2) Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the OC and VOC contents of the materials employed in this emissions unit.

g) Miscellaneous Requirements

(1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05915, as issued on May 3, 2007, for this emissions unit.