



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
ASHTABULA COUNTY**

**CERTIFIED MAIL**

Street Address:

50 West Town Street, Suite 700

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 02-22417**

**Fac ID: 0204010442**

**DATE: 7/3/2007**

Iten Industries Plant 3  
Mark Kaiser  
4001 Benefit Ave  
Ashtabula, OH 44004

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

Sincerely,

*Michael W. Ahern*

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

NEDO



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**Permit To Install  
Terms and Conditions**

**Issue Date: 7/3/2007  
Effective Date: 7/3/2007**

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**FINAL PERMIT TO INSTALL 02-22417**

Application Number: 02-22417  
Facility ID: 0204010442  
Permit Fee: **\$1700**  
Name of Facility: Iten Industries Plant 3  
Person to Contact: Mark Kaiser  
Address: 4001 Benefit Ave  
Ashtabula, OH 44004

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**1303 West 38th St  
Ashtabula, Ohio**

Description of proposed emissions unit(s):  
**2 pultrusion sheet pullers, scale mixer.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Chris Korleski  
Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to

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the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 2. Scheduled Maintenance/Malfunction Reporting

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

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

## 3. Risk Management Plans

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

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#### 4. Title IV Provisions

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

#### 5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

#### 6. General Requirements

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

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**7. Fees**

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

**8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

**9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

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- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

#### 10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

#### 11. Best Available Technology

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

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**12. Air Pollution Nuisance**

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

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### **13. Permit-To-Install**

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

## **B. State Only Enforceable Permit-To-Install General Terms and Conditions**

### **1. Compliance Requirements**

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

### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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

### **3. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder.

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The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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**4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**5. Construction of New Sources(s)**

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**6. Public Disclosure**

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

**7. Applicability**

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

**8. Construction Compliance Certification**

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

**9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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

**C. Permit-To-Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	36.4
OC (cleanup materials, acetone)	28.0

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## **Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

### **MACT SUBPART WWWW REQUIREMENTS**

1. The following emissions units are subject to 40 CFR Part 63, Subpart WWWW-- National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production:

P012 - Sheet Pultrusion Unit No. 1;

P013 - Pultrusion Unit No. 8, equipped with a cut-off saw, and a common baghouse;

P014 - Cowels Mixer No. 2, with a fabric filter for dust collection; and

P015 - Pultrusion Unit No. 9, equipped with a cut-off saw, and a common baghouse.

2. The permittee is subject to the following requirements specified in 40 CFR Part 63, Subpart A as listed in Table 15 of 40 CFR Part 63, Subpart WWWW:

Parts 63.1 (a)(1)-(4), 63.1(a)(6), 63.1 (a)(10)-(14), 63.1(b)(1), 63.1 (b)(3), 63.1 (c)(1) and (2), 63.1 (c)(5), 63.1 (e), 63.2, 63.3, 63.4, 63.5 (a)(1) and (2), 63.5(b)(1), 63.5(b)(3) and (4), 63.5 (b)(6), 63.5 (d)(1) and (2), 63.5 (d)(4), 63.5 (e)(1) - (5), 63.5 (f)(1) and (2), 63.6 (a)(1) and (2), 63.6 (b)(1)-(5), 63.6 (b)(7), 63.6 (c)(1) and (2), 63.6 (c)(5), 63.6 (e)(1) - (3), 63.6 (f)(2) and (3), 63.6 (g)(1) - (3), 63.6 (i)(1)-(14), 63.6 (i)(16), 63.6 (j), 63.7 (a)(1), 63.7 (a)(3), 63.7 (b)(1) and (2), 63.7 (c), 63.7 (d), 63.7(e), 63.7 (f), 63.7 (g), 63.7 (h), 63.8 (a)(1) and (2), 63.8 (a)(4), 63.8 (b)(1) - (3), 63.8 (c)(1) - (4), 63.8 (c)(6) - (8), 63.8 (d), 63.8 (e)(1) - (4), 63.8 (e)(5)(i), 63.8 (f)(1) - (6), 63.8 (g)(1) - (5), 63.9 (a)(1)-(4), 63.9 (b)(1) and (2), 63.9 (b)(4)(i), 63.9 (b)(4)(v), 63.9 (b)(5), 63.9(c), 63.9 (d), 63.9 (e), 63.9 (g)(1), 63.9 (g)(3), 63.9 (h)(1) - (3), 63.9 (h)(5) and (6), 63.9 (i), 63.9(j), 63.10 (a), 63.10 (b)(1), 63.10 (b)(2)(i) - (xiv), 63.10 (b)(3), 63.10 (c)(1), 63.10 (c)(5) - (8), 63.10 (c)(10) - (15), 63.10 (d)(1) and (2), 63.10 (d)(4) and (5), 63.10 (e)(1) - (3), 63.10 (f), 63.11, 63.12, 63.13, 63.14, and 63.15.

3. The permittee submitted an Initial Notification on September 20, 2004. If there is a change in any information submitted in the Initial Notification, the permittee must submit the changes in writing to the Administrator within 15 calendar days after the change.
4. The permittee submitted a Notification of Compliance Status report on August 8, 2006. If there is a change in any information submitted in the Initial Notification, the permittee must submit the changes in writing to the Administrator within 15 calendar days after the change.

### **B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P012) - Sheet Pultrusion Unit No. 1.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day, excluding emissions from cleanup materials.  See section A.I.2.a.
OAC rule 3745-31-02(A)(2)	See section A.II.1.
40 CFR Part 63, Subpart WWWW	See sections A.II.2 and A.II.3.

**2. Additional Terms and Conditions**

- 2.a The OC emissions from the pultrusion operations consist of styrene, which is a photochemically reactive material (PRM) as defined in OAC rule 3745-21-01(C)(5).

**II. Operational Restrictions**

1. The permittee shall use only acetone as cleanup materials in this emissions unit.
2. The permittee shall install and operate a wet-area enclosure with resin drip collection to reduce total organic HAP emissions by at least 60 weight percent, per the requirements contained in 63.5830 of 40 CFR Part 63, Subpart WWWW. These requirements for this pultrusion unit, with no pre-mold heat and no direct die injection, are as follows:
  - a. The enclosure must cover and enclose the open resin bath and the forming area in which reinforcements are pre-wet or wet-out and moving toward the die.
  - b. The surfaces of the enclosure must be closed except for openings to allow material to enter and exit the enclosure.
  - c. The enclosure must extend from the beginning of the resin bath to within 0.5 inch or less of the die entrance.

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- d. The enclosure can only be constructed high enough to clear the highest part of the pultrusion line that must be inside the enclosure.
  - e. The total open area of the enclosure must not exceed 2 (two) times the cross sectional area of the puller window. All areas which are open need to be included in the total open area calculation with the exception of access panels, door and/or hatches that are part of the enclosure. The area which is displaced by entering reinforcement or exiting product is considered open. Areas covered by brush covers are considered closed.
  - f. Open areas for level control devices, monitoring devices, agitation shafts, and/or fill hoses must have no more than 1.0 inch clearance.
  - g. Any access panels, doors, and/or hatches that are part of the enclosure must close tightly to avoid vapor leakage. Damaged access panels, doors, and/or hatches that allow vapor leakage must be replaced.
  - h. The wet-area enclosure shall not be removed from the pultrusion line, and the access panels, doors, and/or hatches that are part of the wet-area enclosure must remain closed whenever resin is in the bath, except for the following periods of time:
    - i. 30 minutes per any 8-hour shift.
    - ii. 45 minutes per any 12-hour shift.
    - iii. 90 minutes per any day, if the machine operates 24 hours in a day.
    - iv. The time restrictions do not apply if the open doors or panels do not cause the limit of two times the puller window area to be exceeded.
    - v. The facility may average the times that access panels, doors, and/or hatches are open across all operating lines. In this case, the average must not exceed the times shown above. All lines included in the average must have operated the entire time period being averaged.
  - i. No fans, blowers, and/or air lines shall be allowed within the enclosure. The enclosure must not be ventilated.
  - j. Resin drip shall be captured within the enclosure and returned by gravity to the resin bath.
3. The permittee shall keep all containers that store HAP-containing materials closed or covered, except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

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### III. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
  - a. the company identification for each resin mix employed;
  - b. the weight of each resin mix employed, in pounds;
  - c. the OC content of each resin mix employed, in percent by weight;
  - d. the total OC emission rate for all the resin mixes employed, in pounds per day, calculated by the following equation:

$$E(OC) = [\text{summation of } (W_i \times OC_i)] \times EF(OC_i) \times (0.40)$$

where:

$E(OC)$  = OC emissions, as from all resin mix operations, in pounds per day;

$W_i$  = the weight of resin mix (  $i$  ) employed, as specified in section A.III.1.b, in pounds per day;

$OC_i$  = the OC content of resin mix (  $i$  ), as specified in section A.III.1.c, in percent by weight;

$EF(OC_i)$  = the emissions factor (  $i$  ):

- i. For OC emissions (politen), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88));
- ii. For OC emissions (epoxy), which is 2.34% or 0.0234 (emission factor developed by Iten Industries (12/04)); and

0.40 = a factor that accounts for the 60 weight percent reduction of OC by compliance with section A.II.3;

- e. the actual number of hours that the emissions unit was in operation; and

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- f. the average, hourly OC emission rate for all the resin mixes employed, i.e., (d)/(e), in pounds per hour (average).
2. The permittee shall collect and record the following information for each month for this emissions unit:
  - a. the company identification for each cleanup material employed; and
  - b. documentation on whether any cleanup materials, other than acetone, were employed;
3. The permittee shall perform inspections of this emissions unit in accordance with the following frequencies:
  - a. Keep all containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.  
  
Minimum inspection frequency: once per batch of resin mix processed
  - b. The wet-area enclosure is in place when resin mix is present in the resin bath, as specified in section A.II.2.h.  
  
Minimum inspection frequency: all times when resin mix is present in the resin bath

The purpose of the inspections is to ensure that equipment standard(s) or work practice(s) to minimize OC emissions are employed. The inspections shall be performed during representative, normal operation conditions.
4. Except as otherwise provided in section A.II.2.h.iv for section A.III.4.b, the permittee shall maintain records of the following information:
  - a. the date and reason any required inspections were not performed in section A.III.3; and
  - b. the date and duration that the wet area enclosure was removed when resin was present in the bath and/or that wet-area enclosure's access panels, doors, hatches and/or covers were open when resin was present in the bath, such that the open area was greater than 2 times the puller window area.

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The purpose of the inspections is to ensure that the methods to reduce OC emissions are employed. The inspections shall be performed during representative, normal operation conditions.

5. The permittee must maintain a copy of each notification and report submitted to comply with Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted. The permittee must demonstrate initial compliance, as required in Table 8 and Table 9 of 40 CFR Part 63, Subpart WWWW, by submitting certified statements in the notification of compliance status for the following work practice standards:
  - i. a certified statement of compliance in the notice of compliance status report that all pultrusion lines not controlled with an add-on control device, but for which an emission reduction is being claimed, are using direct die injection, and/or wet-area enclosures that meet the criteria of § 63.5830 (section A.II.2);
  - ii. a certified statement of compliance in the notice of compliance status report that all cleaning materials contain no HAP; and
  - iii. a certified statement of compliance in the notice of compliance status report that all HAP-containing storage containers are kept closed or covered except when adding or removing materials, and that any bulk tanks are vented only as necessary for safety.
6. The permittee shall maintain files of all information (including all reports and notifications) in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that include the following information:
  - a. an identification of each day during which the average hourly OC emissions from this emissions unit exceeded 8 pounds per hour, excluding emissions from cleanup materials, and the actual average hourly OC emissions for each such day;
  - b. an identification of each day during which the OC emissions from this emissions unit exceeded 40 pounds per day, excluding emissions from cleanup materials,

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and the actual OC emissions for each such day;

- c. an identification of each day during which an inspection was not performed by the required frequency;
  - d. an identification of each month during which cleanup materials, other than acetone, were employed, and the actual OC emissions for each such month; and
  - e. an identification of the date and duration of time that the wet area enclosure was removed when resin was present in the bath and/or that the wet-area enclosure's access panels, doors, and/or hatches were open when resin was present in the bath, such that the open area was greater than 2 times the puller window area, for any period of time exceeding 30 minutes per any 8-hour shift, 45 minutes per any 12-hour shift or 90 minutes per any day when the machine is operated 24 hours in a day.
2. The permittee shall submit a semiannual compliance report. Each semiannual compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

Each semiannual compliance report shall be postmarked or delivered no later than January 31 and July 31, whichever date is the first date following the end of the semiannual reporting period.

Each semiannual compliance report must contain the following information:

- a. the company name and address;
- b. a statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
- c. the date of the report and the beginning and ending dates of the reporting period;
- d. if there are no deviations from any HAP emission limitation (i.e., emission limit and operating limit), and there are no deviations from the work practice standards in this 40 CFR Part 63, Subpart WWWW, a statement that there were no deviations from the organic HAP emission limitations or work practice standards during the reporting period; and

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- e. for each deviation from an organic HAP emission limitation and for each deviation from the requirements for work practice standards, the compliance report must contain the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each affected source that has obtained a Title V operating permit pursuant to 40 CFR Part 70 or 71 must report all deviations as defined in 40 CFR Part 63, Subpart WWWW in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 of 40 CFR Part 63, Subpart WWWW, along with, or as part of, the semiannual monitoring report required by 40 CFR Part 70.6(a)(3)(iii)(A) or 40 CFR Part 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in 40 CFR Part 63, Subpart WWWW, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

3. If there is a change in any information submitted in any notification, the change must be submitted in writing to the Administrator within 15 calendar days after the change.
4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by February 1 of each year.

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**V. Testing Requirements**

1. Compliance with the allowable emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

OC emissions shall not exceed 8 lbs/hr, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance with the average hourly allowable OC emission limitation above may be based on the monitoring and record keeping requirements specified in section A.III.1 of this permit.

If required, the permittee shall demonstrate compliance with this emission limitation or the 60% by weight organic HAP emissions reduction through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, and/or 40 CFR Part 51, Appendix M, Methods 204A through 204F, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emission Limitation:

OC emissions shall not exceed 40 lbs/day, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation above shall be based on the monitoring and record keeping requirements specified in section A.III.1 of this permit.

**VI. Miscellaneous Requirements**

None

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P012) - Sheet Pultrusion Unit No. 1.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P013) - Pultrusion Unit No. 8, equipped with a cut-off saw, and a common baghouse.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day, excluding emissions from cleanup materials.  See section A.I.2.a.
OAC rule 3745-31-02(A)(2)	See section A.II.1.
40 CFR Part 63, Subpart WWWW	See sections A.II.2 and A.II.3.
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as specified by the rule.
OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 lb/hr.
ORC 3704.03(T)(4)	See section A.I.2.b.

**2. Additional Terms and Conditions**

- 2.a The OC emissions from the pultrusion operations consist of styrene, which is a photochemically reactive material (PRM) as defined in OAC rule 3745-21-01(C)(5).
- 2.b The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the calculated annual emission rate for particulate emissions is less than ten tons per year taking into account the federally enforceable rule limit of 0.551 lb/hr under OAC rule 3745-17-11(B).

**II. Operational Restrictions**

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1. The permittee shall use only acetone as cleanup materials in this emissions unit.
2. The permittee shall install and operate a wet-area enclosure with resin drip collection to reduce total organic HAP emissions by at least 60 weight percent, per the requirements contained in 63.5830 of 40 CFR Part 63, Subpart WWWW. These requirements for this pultrusion unit, with no pre-mold heat and no direct die injection, are as follows:
  - a. The enclosure must cover and enclose the open resin bath and the forming area in which reinforcements are pre-wet or wet-out and moving toward the die.
  - b. The surfaces of the enclosure must be closed except for openings to allow material to enter and exit the enclosure.
  - c. The enclosure must extend from the beginning of the resin bath to within 0.5 inch or less of the die entrance.
  - d. The enclosure can only be constructed high enough to clear the highest part of the pultrusion line that must be inside the enclosure.
  - e. The total open area of the enclosure must not exceed 2 (two) times the cross sectional area of the puller window. All areas which are open need to be included in the total open area calculation with the exception of access panels, door and/or hatches that are part of the enclosure. The area which is displaced by entering reinforcement or exiting product is considered open. Areas covered by brush covers are considered closed.
  - f. Open areas for level control devices, monitoring devices, agitation shafts, and/or fill hoses must have no more than 1.0 inch clearance.
  - g. Any access panels, doors, and/or hatches that are part of the enclosure must close tightly to avoid vapor leakage. Damaged access panels, doors, and/or hatches that allow vapor leakage must be replaced.
  - h. The wet-area enclosure shall not be removed from the pultrusion line, and the access panels, doors, and/or hatches that are part of the wet-area enclosure must remain closed whenever resin is in the bath, except for the following periods of time:
    - i. 30 minutes per any 8-hour shift.

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- ii. 45 minutes per any 12-hour shift.
  - iii. 90 minutes per any day, if the machine operates 24 hours in a day.
  - iv. The time restrictions do not apply if the open doors or panels do not cause the limit of two times the puller window area to be exceeded.
  - v. The facility may average the times that access panels, doors, and/or hatches are open across all operating lines. In this case, the average must not exceed the times shown above. All lines included in the average must have operated the entire time period being averaged.
- i. No fans, blowers, and/or air lines shall be allowed within the enclosure. The enclosure must not be ventilated.
  - j. Resin drip shall be captured within the enclosure and returned by gravity to the resin bath.
3. The permittee shall keep all containers that store HAP-containing materials closed or covered, except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

### III. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
- a. the company identification for each resin mix employed;
  - b. the weight of each resin mix employed, in pounds;
  - c. the OC content of each resin mix employed, in percent by weight;
  - d. the total OC emission rate for all the resin mixes employed, in pounds per day, calculated by the following equation:

$$E(OC) = [\text{summation of } (W_i \times OC_i)] \times EF(OC_i) \times (0.40)$$

where:

$E(OC)$  = OC emissions from all resin mix operations, in pounds per day;

$W_i$  = the weight of resin mix ( i ) employed, as specified in section A.III.1.b, in pounds per day;

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$OC_i$  = the OC content of resin mix ( i ), as specified in section A.III.1.c, in percent by weight;

$EF(OC_i)$  = the emissions factor ( i ):

- i. For OC emissions (politen), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88));
- ii. For OC emissions (epoxy), which is 2.34% or 0.0234 (emission factor developed by Iten Industries (12/04)); and

0.40 = a factor that accounts for the 60 weight percent reduction of OC by compliance with section A.II.3;

- e. the actual number of hours that the emissions unit was in operation; and
  - f. the average, hourly OC emission rate for all the resin mixes employed, i.e., (d)/(e), in pounds per hour (average).
2. The permittee shall collect and record the following information for each month for this emissions unit:
- a. the company identification for each cleanup material employed; and
  - b. documentation on whether any cleanup materials, other than acetone, were employed;
3. The permittee shall perform inspections of this emissions unit in accordance with the following frequencies:
- a. Keep all containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.  
  
Minimum inspection frequency: once per batch of resin mix processed
  - b. The wet-area enclosure is in place when resin mix is present in the resin bath, as specified in section A.II.2.h.  
  
Minimum inspection frequency: all times when resin mix is present in the resin

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bath

The purpose of the inspections is to ensure that equipment standard(s) or work practice(s) to minimize OC emissions are employed. The inspections shall be performed during representative, normal operation conditions.

4. Except as otherwise provided in section A.II.2.h.iv for section A.III.4.b, the permittee shall maintain records of the following information:
  - a. the date and reason any required inspections were not performed in section A.III.3; and
  - b. the date and duration that the wet area enclosure was removed when resin was present in the bath and/or that wet-area enclosure's access panels, doors, hatches and/or covers were open when resin was present in the bath, such that the open area was greater than 2 times the puller window area.

The purpose of the inspections is to ensure that the methods to reduce OC emissions are employed. The inspections shall be performed during representative, normal operation conditions.

5. The permittee must maintain a copy of each notification and report submitted to comply with Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted. The permittee must demonstrate initial compliance, as required in Table 8 and Table 9 of 40 CFR Part 63, Subpart WWWW, by submitting certified statements in the notification of compliance status for the following work practice standards:
  - i. a certified statement of compliance in the notice of compliance status report that all pultrusion lines not controlled with an add-on control device, but for which an emission reduction is being claimed, are using direct die injection, and/or wet-area enclosures that meet the criteria of § 63.5830 (section A.II.2);
  - ii. a certified statement of compliance in the notice of compliance status report that all cleaning materials contain no HAP; and
  - iii. a certified statement of compliance in the notice of compliance status report that all HAP-containing storage containers are kept closed or covered except when adding or removing materials, and that any bulk tanks are vented only as necessary for safety.
6. The permittee shall maintain files of all information (including all reports and notifications) in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a

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minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that include the following information:
  - a. an identification of each day during which the average hourly OC emissions from this emissions unit exceeded 8 pounds per hour, excluding emissions from cleanup materials, and the actual average hourly OC emissions for each such day;
  - b. an identification of each day during which the OC emissions from this emissions unit exceeded 40 pounds per day, excluding emissions from cleanup materials, and the actual OC emissions for each such day;
  - c. an identification of each day during which an inspection was not performed by the required frequency;
  - d. an identification of each month during which cleanup materials, other than acetone, were employed, and the actual OC emissions for each such month; and
  - e. an identification of the date and duration of time that the wet area enclosure was removed when resin was present in the bath and/or that the wet-area enclosure's access panels, doors, and/or hatches were open when resin was present in the bath, such that the open area was greater than 2 times the puller window area, for any period of time exceeding 30 minutes per any 8-hour shift, 45 minutes per any 12-hour shift or 90 minutes per any day when the machine is operated 24 hours in a day.
2. The permittee shall submit a semiannual compliance report. Each semiannual compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

Each semiannual compliance report shall be postmarked or delivered no later than January 31 and July 31, whichever date is the first date following the end of the semiannual reporting period.

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Each semiannual compliance report must contain the following information:

- a. the company name and address;
- b. a statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
- c. the date of the report and the beginning and ending dates of the reporting period;
- d. if there are no deviations from any HAP emission limitation (i.e., emission limit and operating limit), and there are no deviations from the work practice standards in this 40 CFR Part 63, Subpart WWWW, a statement that there were no deviations from the organic HAP emission limitations or work practice standards during the reporting period; and
- e. for each deviation from an organic HAP emission limitation and for each deviation from the requirements for work practice standards, the compliance report must contain the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each affected source that has obtained a Title V operating permit pursuant to 40 CFR Part 70 or 71 must report all deviations as defined in 40 CFR Part 63, Subpart WWWW in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 of 40 CFR Part 63, Subpart WWWW, along with, or as part of, the semiannual monitoring report required by 40 CFR Part 70.6(a)(3)(iii)(A) or 40 CFR Part 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in 40 CFR Part 63, Subpart WWWW, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

3. If there is a change in any information submitted in any notification, the change must be submitted in writing to the Administrator within 15 calendar days after the change.
4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by February 1 of each year.

## **V. Testing Requirements**

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1. Compliance with the allowable emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

OC emissions shall not exceed 8 lbs/hr, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above may be based on the monitoring and record keeping requirements specified in section A.III.1 of this permit.

If required, the permittee shall demonstrate compliance with this emission limitation or the 60% by weight organic HAP emissions reduction through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, and/or 40 CFR Part 51, Appendix M, Methods 204A through 204F, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emission Limitation:

OC emissions shall not exceed 40 lbs/day, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation above shall be based on the monitoring and record keeping requirements specified in section A.III.1 of this permit.

- c. Emission Limitation:

PE shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with Methods 1 through 5 of 40 CFR Part 60,

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Appendix A.

## d. Emission Limitation:

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

Applicable Compliance Method:

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

**VI. Miscellaneous Requirements**

None

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**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P013) - Pultrusion Unit No. 8, equipped with a cut-off saw, and a common baghouse.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P014) - Cowels Mixer No. 2, with a fabric filter for dust collection.**

<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 3.31 lbs/hr and 14.5 tons/year, excluding emissions from cleanup materials.
OAC rule 3745-31-02(A)(2)	See section A.II.1.
40 CFR Part 63, Subpart WWWW	See section A.II.2.
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as specified by the rule.
OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 lb/hr.
ORC 3704.03(T)(4)	See section A.I.2.a.

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the calculated annual emission rate for particulate emissions is less than ten tons per year taking into account the federally enforceable rule limit of 0.551 lb/hr under OAC rule 3745-17-11(B).

**II. Operational Restrictions**

1. The permittee shall use only acetone as cleanup materials in this emissions unit.
2. The following work practice standards shall be employed to minimize the generation of

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styrene emissions:

- a. Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
- b. Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety.
- c. Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
- d. Keep all containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
  - a. the company identification for each resin mix employed;
  - b. the weight of each resin mix employed, in pounds;
  - c. the OC content of each resin mix employed, in percent by weight;
  - d. the total OC emission rate for all the resin mixes employed, in pounds per day, calculated by the following equation:

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

where:

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

$W_i$  = the weight of resin mix ( i ) produced, as specified in section A.III.1.b, in pounds per day;

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$OC_i$  = the OC content of mix ( i ), as specified in section A.III.1.c, in percent by weight; and

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

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- e. the actual number of hours that the emissions unit was in operation; and
  - f. the average, hourly OC emission rate for all resin mixes employed, calculated by (d)/(e), in average, pounds per hour.
2. The permittee shall collect and record the following information for each month for this emissions unit:
- a. the company identification for each cleanup material employed;
  - b. documentation on whether any cleanup materials, other than acetone, were employed;
3. Except as otherwise provided in this section A.III.5, the permittee shall perform inspections of this emissions unit in accordance with the following frequencies:

Process unit:

- i. Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
- ii. Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety.
- iii. Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
- iv. Keep all containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

Minimum inspection frequency:  
once per batch of resin mix produced

The purpose of the inspections is to ensure that equipment standard(s) or work practice(s) to minimize OC emissions are employed. The inspections shall be performed during representative, normal operation conditions.

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4. The permittee shall maintain daily records of the following information:
  - a. the date and reason any required inspection was not performed in section A.III.3; and
  - b. the date and reason when the equipment standard(s) or work practice(s) were not implemented while the emissions unit was in operation. The equipment standard(s) or work practice(s) are specified in section A.III.3, (i.e, use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation, keeping all containers that store HAP-containing materials closed or covered except during the addition or removal of materials, and etc.).
5. The permittee may, upon receipt of written approval from the Ohio EPA Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
6. The permittee must maintain a copy of each notification and report submitted to comply with Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted. The permittee must demonstrate initial compliance, as required in Table 9 of 40 CFR Part 63, Subpart WWWW, by submitting certified statements in the notification of compliance status for the following work practice standards:
  - i. a certified statement of compliance in the notice of compliance status report that all cleaning materials contain no HAP;
  - ii. a certified statement of compliance in the notice of compliance status report that all HAP-containing storage containers are kept closed or covered except when adding or removing materials, and that any bulk tanks are vented only as necessary for safety;
  - iii. a certified statement of compliance in the notice of compliance status report that mixer covers are closed during mixing except when adding materials to the mixers, and that gaps around mixer shafts and required instrumentation are less than 1 inch;
  - iv. a certified statement of compliance in the notice of compliance status report that

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mixers are not actively vented to the atmosphere when the agitator is turning except when adding materials or as necessary for safety; and

- v. a certified statement of compliance in the notice of compliance status report that mixers closed except when adding materials to the mixing vessels.
7. The permittee shall maintain files of all information (including all reports and notifications) in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

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#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that include the following information:
  - a. an identification of each day during which the average hourly OC emissions, excluding cleanup materials, from this emissions unit exceeded 3.31 pounds per hour, excluding emissions from cleanup materials, and the actual average hourly OC emissions for each such day;
  - b. an identification of each month during which cleanup materials, other than acetone, were employed, and the actual OC emissions for each such month;
  - c. an identification of each day during which an inspection was not performed by the required frequency; and
  - d. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented.
2. The permittee shall submit a semiannual compliance report. Each semiannual compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

Each semiannual compliance report shall be postmarked or delivered no later than January 31 and July 31, whichever date is the first date following the end of the semiannual reporting period.

Each semiannual compliance report must contain the following information:

- a. the company name and address;
- b. a statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
- c. the date of the report and the beginning and ending dates of the reporting period;
- d. if there are no deviations from the work practice standards in this 40 CFR Part 63, Subpart WWWW, a statement that there were no deviations from the work practice standards during the reporting period; and

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- e. for each deviation from each deviation from the requirements for work practice standards, the compliance report must contain the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

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Each affected source that has obtained a Title V operating permit pursuant to 40 CFR Part 70 or 71 must report all deviations as defined in 40 CFR Part 63, Subpart WWWW in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 of 40 CFR Part 63, Subpart WWWW, along with, or as part of, the semiannual monitoring report required by 40 CFR Part 70.6(a)(3)(iii)(A) or 40 CFR Part 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in 40 CFR Part 63, Subpart WWWW, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

3. If there is a change in any information submitted in any notification, the change must be submitted in writing to the Administrator within 15 calendar days after the change.
4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by February 1 of each year.

## **V. Testing Requirements**

1. Compliance with the allowable emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

OC emissions shall not exceed 3.31 lbs/hr, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above may be based on the monitoring and record keeping requirements specified in section A.III.1 of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, and/or 40 CFR Part 51,

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Appendix M, Methods 204A through 204F as appropriate, or an equivalent alternate method as approved by Ohio EPA.

b. Emission Limitation:

OC emissions shall not exceed 14.5 tons/year, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be based on the monitoring and record keeping requirements specified in section A.III.1 of this permit, and shall be the summation of the daily OC emissions, from section A.III.1, for the calendar year, divided by 2000 pounds per ton.

c. Emission Limitation:

PE shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A.

d. Emission Limitation:

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

Applicable Compliance Method:

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

## VI. Miscellaneous Requirements

None

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**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P014) - Cowels Mixer No. 2, with a fabric filter for dust collection.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P015) - Pultrusion Unit No. 9, equipped with a cut-off saw, and a common baghouse.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day, excluding emissions from cleanup materials.  See section A.I.2.a.
OAC rule 3745-31-02(A)(2)	See section A.II.1.
40 CFR Part 63, Subpart WWWW	See sections A.II.2 and A.II.3.
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as specified by the rule.
OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 lb/hr.
ORC 3704.03(T)(4)	See section A.I.2.b.

**2. Additional Terms and Conditions**

- 2.a The OC emissions from the pultrusion operations consist of styrene, which is a photochemically reactive material (PRM) as defined in OAC rule 3745-21-01(C)(5).
- 2.b The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the calculated annual emission rate for particulate emissions is less than ten tons per year taking into account the federally enforceable rule limit of 0.551 lb/hr under OAC rule 3745-17-11(B).

**II. Operational Restrictions**

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1. The permittee shall use only acetone as cleanup materials in this emissions unit.
2. The permittee shall install and operate a wet-area enclosure with resin drip collection to reduce total organic HAP emissions by at least 60 weight percent, per the requirements contained in 63.5830 of 40 CFR Part 63, Subpart WWWW. These requirements for this pultrusion unit, with no pre-mold heat and no direct die injection, are as follows:
  - a. The enclosure must cover and enclose the open resin bath and the forming area in which reinforcements are pre-wet or wet-out and moving toward the die.
  - b. The surfaces of the enclosure must be closed except for openings to allow material to enter and exit the enclosure.
  - c. The enclosure must extend from the beginning of the resin bath to within 0.5 inch or less of the die entrance.
  - d. The enclosure can only be constructed high enough to clear the highest part of the pultrusion line that must be inside the enclosure.
  - e. The total open area of the enclosure must not exceed 2 (two) times the cross sectional area of the puller window. All areas which are open need to be included in the total open area calculation with the exception of access panels, door and/or hatches that are part of the enclosure. The area which is displaced by entering reinforcement or exiting product is considered open. Areas covered by brush covers are considered closed.
  - f. Open areas for level control devices, monitoring devices, agitation shafts, and/or fill hoses must have no more than 1.0 inch clearance.
  - g. Any access panels, doors, and/or hatches that are part of the enclosure must close tightly to avoid vapor leakage. Damaged access panels, doors, and/or hatches that allow vapor leakage must be replaced.
  - h. The wet-area enclosure shall not be removed from the pultrusion line, and the access panels, doors, and/or hatches that are part of the wet-area enclosure must remain closed whenever resin is in the bath, except for the following periods of time:
    - i. 30 minutes per any 8-hour shift.
    - ii. 45 minutes per any 12-hour shift.
    - iii. 90 minutes per any day, if the machine operates 24 hours in a day.
    - iv. The time restrictions do not apply if the open doors or panels do not

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cause the limit of two times the puller window area to be exceeded.

- v. The facility may average the times that access panels, doors, and/or hatches are open across all operating lines. In this case, the average must not exceed the times shown above. All lines included in the average must have operated the entire time period being averaged.
  - i. No fans, blowers, and/or air lines shall be allowed within the enclosure. The enclosure must not be ventilated.
  - j. Resin drip shall be captured within the enclosure and returned by gravity to the resin bath.
3. The permittee shall keep all containers that store HAP-containing materials closed or covered, except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

### III. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
- a. the company identification for each resin mix employed;
  - b. the weight of each resin mix employed, in pounds;
  - c. the OC content of each resin mix employed, in percent by weight;
  - d. the total OC emission rate for all the resin mixes employed, in pounds per day, calculated by the following equation:

$$E(OC) = [\text{summation of } (W_i \times OC_i)] \times EF(OC_i) \times (0.40)$$

where:

$E(OC)$  = OC emissions from all resin mix operations, in pounds per day;

$W_i$  = the weight of resin mix ( i ) employed, as specified in section A.III.1.b, in pounds per day;

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$OC_i$  = the OC content of resin mix ( i ), as specified in section A.III.1.c, in percent by weight;

$EF(OC_i)$  = the emissions factor ( i ):

- i. For OC emissions (politen), which is 4% or 0.04 (AP-42 Chapter 4.12, Table 4.12-2 (9/88));
- ii. For OC emissions (epoxy), which is 2.34% or 0.0234 (emission factor developed by Iten Industries (12/04)); and

0.40 = a factor that accounts for the 60 weight percent reduction of OC by compliance with section A.II.3;

- e. the actual number of hours that the emissions unit was in operation; and
  - f. the average, hourly OC emission rate for all the resin mixes employed, i.e., (d)/(e), in pounds per hour (average).
2. The permittee shall collect and record the following information for each month for this emissions unit:
    - a. the company identification for each cleanup material employed; and
    - b. documentation on whether any cleanup materials, other than acetone, were employed;
  3. The permittee shall perform inspections of this emissions unit in accordance with the following frequencies:
    - a. Keep all containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.  
  
Minimum inspection frequency: once per batch of resin mix processed
    - b. The wet-area enclosure is in place when resin mix is present in the resin bath, as specified in section A.II.2.h.  
  
Minimum inspection frequency: all times when resin mix is present in the resin bath

The purpose of the inspections is to ensure that equipment standard(s) or work practice(s) to minimize OC emissions are employed. The inspections shall be performed during representative, normal operation conditions.

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4. Except as otherwise provided in section A.II.2.h.iv for section A.III.4.b, the permittee shall maintain records of the following information:
  - a. the date and reason any required inspections were not performed in section A.III.3; and
  - b. the date and duration that the wet area enclosure was removed when resin was present in the bath and/or that wet-area enclosure's access panels, doors, hatches and/or covers were open when resin was present in the bath, such that the open area was greater than 2 times the puller window area.

The purpose of the inspections is to ensure that the methods to reduce OC emissions are employed. The inspections shall be performed during representative, normal operation conditions.

5. The permittee must maintain a copy of each notification and report submitted to comply with Subpart WWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted. The permittee must demonstrate initial compliance, as required in Table 8 and Table 9 of 40 CFR Part 63, Subpart WWW, by submitting certified statements in the notification of compliance status for the following work practice standards:
  - i. a certified statement of compliance in the notice of compliance status report that all pultrusion lines not controlled with an add-on control device, but for which an emission reduction is being claimed, are using direct die injection, and/or wet-area enclosures that meet the criteria of § 63.5830 (section A.II.2);
  - ii. a certified statement of compliance in the notice of compliance status report that all cleaning materials contain no HAP; and
  - iii. a certified statement of compliance in the notice of compliance status report that all HAP-containing storage containers are kept closed or covered except when adding or removing materials, and that any bulk tanks are vented only as necessary for safety.
6. The permittee shall maintain files of all information (including all reports and notifications) in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a

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minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that include the following information:
  - a. an identification of each day during which the average hourly OC emissions from this emissions unit exceeded 8 pounds per hour, excluding emissions from cleanup materials, and the actual average hourly OC emissions for each such day;
  - b. an identification of each day during which the OC emissions from this emissions unit exceeded 40 pounds per day, excluding emissions from cleanup materials, and the actual OC emissions for each such day;
  - c. an identification of each day during which an inspection was not performed by the required frequency;
  - d. an identification of each month during which cleanup materials, other than acetone, were employed, and the actual OC emissions for each such month; and
  - e. an identification of the date and duration of time that the wet area enclosure was removed when resin was present in the bath and/or that the wet-area enclosure's access panels, doors, and/or hatches were open when resin was present in the bath, such that the open area was greater than 2 times the puller window area, for any period of time exceeding 30 minutes per any 8-hour shift, 45 minutes per any 12-hour shift or 90 minutes per any day when the machine is operated 24 hours in a day.
2. The permittee shall submit a semiannual compliance report. Each semiannual compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

Each semiannual compliance report shall be postmarked or delivered no later than January 31 and July 31, whichever date is the first date following the end of the semiannual reporting period.

Each semiannual compliance report must contain the following information:

- a. the company name and address;
- b. a statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;

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- c. the date of the report and the beginning and ending dates of the reporting period;
- d. if there are no deviations from any HAP emission limitation (i.e., emission limit and operating limit), and there are no deviations from the work practice standards in this 40 CFR Part 63, Subpart WWWW, a statement that there were no deviations from the organic HAP emission limitations or work practice standards during the reporting period; and
- e. for each deviation from an organic HAP emission limitation and for each deviation from the requirements for work practice standards, the compliance report must contain the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each affected source that has obtained a Title V operating permit pursuant to 40 CFR Part 70 or 71 must report all deviations as defined in 40 CFR Part 63, Subpart WWWW in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 of 40 CFR Part 63, Subpart WWWW, along with, or as part of, the semiannual monitoring report required by 40 CFR Part 70.6(a)(3)(iii)(A) or 40 CFR Part 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in 40 CFR Part 63, Subpart WWWW, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

- 3. If there is a change in any information submitted in any notification, the change must be submitted in writing to the Administrator within 15 calendar days after the change.
- 4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by February 1 of each year.

## **V. Testing Requirements**

Emissions Unit ID: P015

1. Compliance with the allowable emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

OC emissions shall not exceed 8 lbs/hr, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above may be based on the monitoring and record keeping requirements specified in section A.III.1 of this permit.

If required, the permittee shall demonstrate compliance with this emission limitation or the 60% by weight organic HAP emissions reduction through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, and/or 40 CFR Part 51, Appendix M, Methods 204A through 204F, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emission Limitation:

OC emissions shall not exceed 40 lbs/day, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation above shall be based on the monitoring and record keeping requirements specified in section A.III.1 of this permit.

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c. Emission Limitation:

PE shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A.

d. Emission Limitation:

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

Applicable Compliance Method:

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

**VI. Miscellaneous Requirements**

None

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**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P015) - Pultrusion Unit No. 9, equipped with a cut-off saw, and a common baghouse.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None