



Environmental Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

3/31/2011

Certified Mail

Mr. Pat Davin  
CW Ohio INC.  
1209 Maple Ave.  
Conneaut, OH 44030-2120

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0204020069  
Permit Number: P0107595  
Permit Type: Administrative Modification  
County: Ashtabula

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director 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, made payable to "Ohio Treasurer Josh Mandel," 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

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northeast District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

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





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
CW Ohio INC.**

Facility ID: 0204020069  
Permit Number: P0107595  
Permit Type: Administrative Modification  
Issued: 3/31/2011  
Effective: 3/31/2011





Division of Air Pollution Control
Permit-to-Install
for
CW Ohio INC.

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## Authorization

Facility ID: 0204020069  
Facility Description: Manufacturer of wood and fiberglass building products  
Application Number(s): M0001125, M0001126  
Permit Number: P0107595  
Permit Description: Modification of existing PTIs for removal of duplicative cleanup language.  
Permit Type: Administrative Modification  
Permit Fee: \$0.00  
Issue Date: 3/31/2011  
Effective Date: 3/31/2011

This document constitutes issuance to:

CW Ohio INC.  
1209 Maple Ave.  
Conneaut, OH 44030-2120

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

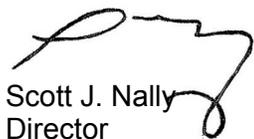
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330)425-9171

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0107595  
Permit Description: Modification of existing PTIs for removal of duplicative cleanup language.

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

<b>Emissions Unit ID:</b>	<b>P040</b>
Company Equipment ID:	Pultrusion resin mixer
Superseded Permit Number:	02-22115
General Permit Category and Type:	Not Applicable

**Group Name: Pultrusion machines**

<b>Emissions Unit ID:</b>	<b>P041</b>
Company Equipment ID:	Pultruder 1
Superseded Permit Number:	02-22115
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P042</b>
Company Equipment ID:	Pultruder 2
Superseded Permit Number:	02-22246
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P043</b>
Company Equipment ID:	Pultruder 3
Superseded Permit Number:	02-22246
General Permit Category and Type:	Not Applicable

## **A. Standard Terms and Conditions**

**1. Federally Enforceable Standard Terms and Conditions**

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

**2. Severability Clause**

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

**3. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

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

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

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

postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

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

## 5. Scheduled Maintenance/Malfunction Reporting

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

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

## 6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

- (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

**7. Best Available Technology**

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

**8. Air Pollution Nuisance**

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

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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

**10. Applicability**

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

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

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

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

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

## **12. Permit-To-Operate Application**

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

## **13. Construction Compliance Certification**

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

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

## **14. Public Disclosure**

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

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

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

## **16. Fees**

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

**17. Permit Transfers**

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

**18. Risk Management Plans**

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

**19. Title IV Provisions**

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

## **B. Facility-Wide Terms and Conditions**

**1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:**

- a) None.

**2. The permittee shall meet the following work practice standard:**

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

**3. Monitoring and/or Recordkeeping Requirements for facility-wide work practice standard:**

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

**4. Reporting Requirements for facility-wide work practice standard:**

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

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

## **C. Emissions Unit Terms and Conditions**

**1. P040, Pultrusion resin mixer**

**Operations, Property and/or Equipment Description:**

Pultrusion resin mixer

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 2,417 lbs/month and 14.5 tons/year.
b.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	See B.2 through B.4 facility-wide work practice standard.  See b)(2)b.i - b)(2)b.iii.
c.	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.
d.	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.9 lb/hr.
e.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/2006	PE shall be less than 10.0 tons/yr. See b)(2)a.

(2) Additional Terms and Conditions

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 0.9 lb PE/hr under OAC rule 3745-17-11.

b. The following work practice standards shall be employed to minimize the generation of styrene emissions:

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.

Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following monthly records for each emissions unit:
  - a. the company identification for each resin mix;
  - b. pounds of each resin mix produced;
  - c. the weight percent of available organic HAP (e.g., styrene, vinyl toluene and/or methyl methacrylate) for each resin mix produced; and
  - d. the total OC emission rate for all resin mix produced, as calculated by the following equation, in pounds per month:

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

where:

HAP<sub>i</sub> = pounds per month of available organic HAP in each resin mix, i, produced;

n = number of resin mix produced; and

EF = each emissions factor.

EF = 0.000292 lb of VOC emissions emitted / lb of available organic HAP input (e.g., styrene, vinyl toluene and/or methyl methacrylate) as determined from emissions testing for P012, conducted on June 11, 1998, at Premix Inc, a similar source.

- (2) The permittee shall perform daily inspections of the mixer when resin is present in the mixing vessel, and record the following information:
  - a. the date and reason why any required inspection was not performed;

- b. the date and all times the mixer cover was not closed over the mixing vessel, when actual mixing is occurring, except when adding materials or changing covers to the mixing vessel;
- c. the date and all times the mixer vents were not closed over the mixing vessel, when actual mixing is occurring, except that venting is allowed during additions of materials, or as necessary prior to adding materials or opening the cover for safety; and
- d. the date and all times when visible gaps were present in the mixer cover, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation when the mixer cover was properly employed.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. each month when OC emissions exceeded the OC emissions limit of 2,417 pounds per month, and the actual OC emissions for each such month.

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

- (2) The permittee must submit semiannual compliance reports:
  - a. if there are no deviations from the work practice standards in b)(2)b.i - b)(2)b.iii, provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., (1) used mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch were permissible around mixer shafts and any required instrumentation; (2) closed any mixer vents when actual mixing was occurring, except that venting was allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and (3) kept the mixer covers closed while actual mixing was occurring except when adding materials or changing covers to the mixing vessels); and
  - b. if there were deviations with the work practice standards in b)(2)b.i - b)(2)b.iii, provide the total operating time of the emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

f) Testing Requirements

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

a. Emission Limitation:

2,417 lbs OC/month and 14.5 tons OC/year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) of these terms and conditions.

b. Emission Limitation:

0.9 lb PE /hr.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emission Limitation:

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

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

**2. Emissions Unit Group - Pultrusion machines: P041, P042, P043,**

EU ID	Operations, Property and/or Equipment Description
P041	Pultrusion unit 1
P042	Pultrusion unit 2
P043	Pultrusion unit 3

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	See B.2 through B.4 facility-wide work practice standard.  See b)(2)b and c)(1).
b.	OAC rule 3745-21-07(G)(2)	Organic compounds (OC) emissions shall not exceed 8 lbs/hr or 40 lbs/day. See b)(2)a.
c.	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(E).
d.	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.
e.	OAC rule 3745-31-05(E), as effective 12/01/06	Particulate emissions (PE) shall be less than 10.0 tons/yr.  Total organic HAP shall be less than 10.0 tons/yr.  See b)(2)c and b)(2)d.
f.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07(G)(2).  See b)(2)e.

(2) Additional Terms and Conditions

a. The OC emissions limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive materials (PRM) are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emissions limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in b)(1)b, d)(1), e)(1)a, e)(1)b and f)(1)a shall be void.

b. The permittee shall reduce total organic HAP emissions by at least 60 percent by weight.

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

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

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

enclosure must remain closed whenever resin is in the bath, except for the following periods of time:

- (a) 30 minutes per any 8 hour shift;
  - (b) 45 minutes per any 12 hour shift;
  - (c) 90 minutes per any day, if the machine operates 24 hours in a day;
  - (d) The time restrictions do not apply if the open doors or panels do not cause the limit of two times the puller window area to be exceeded; and
  - (e) The facility may average the times that access panels, doors, and/or hatches are open across all operating lines. In this case, the average must not exceed the times shown above. All lines included in the average must have operated the entire time period being averaged.
- ix. No fans, blowers, and/or air lines shall be allowed within the enclosure. The enclosure must not be ventilated.
- x. Resin drip shall be captured within the enclosure and returned by gravity to the resin bath.
- c. Permit to Install P0107595 for this air contaminant source takes into account the use of a fabric filter system, whenever this air contaminant source is in operation, with a minimum control efficiency of 90%, by weight for PE, as a voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).
- d. Permit to Install P0107595 for this air contaminant source takes into account the use of a wet area enclosure and resin drip collection system that meet the criteria in b)(2)b, whenever this air contaminant source is in operation, with a minimum control efficiency of 60%, by weight for total organic HAPs, as a voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).
- e. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limitations/control measures no longer apply.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records for each emissions unit:

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

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

where:

HAP<sub>i</sub> = pounds per day of available organic HAP in each resin mix, i, applied.

n = number of resin mix produced; and

EF = each emissions factor.

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

0.60 = OC emissions reduction limit, by weight (0.60 organic HAP emissions reduction limit, by weight, is achieved by meeting the requirements in b)(2)b).

- e. the total number of hours in operation; and
- f. the average hourly OC emission rate for all resins applied, i.e., (d)/(e), in pounds per hour (average).

(2) The permittee shall maintain annual records for each emissions unit:

- a. the company identification for each resin applied;
- b. pounds of each resin applied;
- c. the weight percent of available organic HAP (e.g., styrene and methyl methacrylate) for each resin applied;

- d. the total OC emission rate for all resins applied, as calculated by the following equation, in tons/yr:

$$\text{OC (tons/yr)} = (1 - 0.60) \times \left(\frac{1}{2000}\right) \times \sum_i^n \text{HAP}_i \times \text{EF}$$

where:

HAP<sub>i</sub> = pounds per year of available organic HAP in each resin mix, i, applied;

n = number of resins applied; and

EF = each emissions factor.

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

0.60 = OC emissions reduction limit, by weight (0.60 organic HAP emissions reduction limit, by weight, is achieved by meeting the requirements in b)(2)b).

- (3) The permittee shall inspect daily the wet area enclosure when there is resin present in the resin bath, and record the following information:
- a. the date and reason why any required inspection was not performed;
  - b. the date and all times the enclosure was not in place over the resin bath and there was resin present in the resin bath;
  - c. the date and all times the enclosure's access panels, doors, hatches or covers were open and there was resin present in the resin bath; and
  - d. the date and all times and cause(s) when the wet area enclosure and resin drip collection system did not meet each criterion in b)(2)b.
- (4) The permittee shall maintain a weekly log of filter replacements and any maintenance of the fabric filter system.
- (5) The permittee shall properly operate the fabric filter system and check it at least once per week when the emissions unit is in operation. The permittee shall record all periods of time during which the fabric filter system was not in operation when the emissions unit was in operation.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

- a. an identification of each day when the average hourly OC emissions exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;
- b. an identification of each day when OC emissions exceeded 40 pounds per day, and the actual OC emissions for each such day; and
- c. the length of time, when the particulate control filter was not in service when the emissions unit was in operation.

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

(2) The permittee must submit semiannual compliance reports:

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

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

f) Testing Requirements

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

a. Emission Limitation:

8 lbs OC/hr and 40 lbs OC/day.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in d)(1) of these terms and conditions. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25, 25A, 204, 204A-F, 205 or other approved methods as appropriate.

b. Emission Limitation:

Reduce total organic HAP emissions by at least 60 percent by weight.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in d)(3) of these terms and conditions. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 18, 25, 25A, 204, 204A-F, 205 or other approved methods as appropriate.

c. Emission Limitation:

Total organic HAPs shall be less than 10.0 tons/yr.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in d)(2) of these terms and conditions.

d. Emission Limitation:

Particulate emissions shall be less than 10.0 tons/yr.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable PE limitation above by multiplying the maximum hourly controlled PE rate [(3.7 pounds/hr) x (1 - 0.9) = 0.37 lb/hr] by the maximum annual number of hours of operation (8760 hours/yr), and then dividing by 2000 lbs/ton.

e. Emission Limitation:

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

Applicable Compliance Method:

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

g) Miscellaneous Requirements

- (1) None.