



Environmental
Protection Agency

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

Certified Mail

1/4/2012

Jeffrey Wirth
Verantis Corporation
303 South Center
LaGrange, OH 44050

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

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

Facility ID: 0247070873
Permit Number: P0108005
Permit Type: Renewal
County: Lorain

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Chronicle Telegram. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-NEDO; Canada



Permit Strategy Write-Up

1. Check all that apply:

X Synthetic Minor Determination

Netting Determination

2. Source Description:

Verantis Corporation is a molded fiberglass fabricator located in LaGrange, Ohio, in Lorain County.

This permit limits facility-wide HAP emissions to 9.9 tons per year for each single HAP and 24.9 tons per year for total combined HAPs.

3. Facility Emissions and Attainment Status:

Verantis Corporation is a potential major source of HAP emissions.

Lorain County is attainment for ozone.

4. Source Emissions:

This permit limits facility-wide HAP emissions to 9.9 tons per year for each single HAP and 24.9 tons per year for total combined HAPs.

5. Conclusion:

This permit enables Verantis Corporation to operate as an FEPTIO facility by limiting HAP emissions.

6. Please provide additional notes or comments as necessary:

None

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

Table with 2 columns: Pollutant, Tons Per Year. Row 1: HAP, 9.9 (single HAP). Row 2: HAP, 24.9 (combined HAPs).

PUBLIC NOTICE

1/4/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

Verantis Corporation
303 S CENTER ST,
LaGrange, OH 44050
Lorain County

FACILITY DESC.: Industrial and Commercial Fan and Blower Manufacturing

PERMIT #: P0108005

PERMIT TYPE: Renewal

PERMIT DESC: FEPTIO Renewal permit for a spray paint booth for steel fan parts, two reinforced plastic lay-up and fabrication processes, and a chop spray gun operation. This permit also includes several administrative changes, mainly as a result of rule changes.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitonline.aspx> by entering the permit # or: Kristen Switzer, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Verantis Corporation**

Facility ID:	0247070873
Permit Number:	P0108005
Permit Type:	Renewal
Issued:	1/4/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Verantis Corporation

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Authorization

Facility ID: 0247070873

Application Number(s): A0041506

Permit Number: P0108005

Permit Description: FEPTIO Renewal permit for a spray paint booth for steel fan parts, two reinforced plastic lay-up and fabrication processes, and a chop spray gun operation. This permit also includes several administrative changes, mainly as a result of rule changes.

Permit Type: Renewal

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

Issue Date: 1/4/2012

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

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

This document constitutes issuance to:

Verantis Corporation
303 S CENTER ST
LaGrange, OH 44050

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0108005

Permit Description: FEPTIO Renewal permit for a spray paint booth for steel fan parts, two reinforced plastic lay-up and fabrication processes, and a chop spray gun operation. This permit also includes several administrative changes, mainly as a result of rule changes.

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

Emissions Unit ID:	K001
Company Equipment ID:	K001
Superseded Permit Number:	P0085393
General Permit Category and Type:	Not Applicable

Group Name: Reinforced plastic lay-up

Emissions Unit ID:	K002
Company Equipment ID:	K002
Superseded Permit Number:	P0085393
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	K003
Superseded Permit Number:	P0085393
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K004
Company Equipment ID:	K004
Superseded Permit Number:	02-20369
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

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

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

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

¹Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

Draft Permit-to-Install and Operate

Verantis Corporation

Permit Number: P0108005

Facility ID: 0247070873

Effective Date: To be entered upon final issuance

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions

1. K001, K001

Operations, Property and/or Equipment Description:

Manual painting of steel blower base parts

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. d)(5), d)(6), d)(7), d)(8) and e)(6)
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)d, b)(2)a, b)(2)b, d)(2), e)(3) and e)(4)
- 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 3745-17-07(A)	In accordance with OAC rule 3745-17-07(A)(3)(h), the requirements of OAC rule 3745-17-07(A) do not apply to any air contaminant source which is not subject to any mass emission limitation in OAC rule 3745-17-11.
b.	OAC rule 3745-17-11	In accordance with OAC rule 3745-17-11(A)(1)(i), the requirements of OAC rule 3745-17-11 do not apply to surface coating processes that use less than 5 gallons of coatings per day. See b)(1)c, d)(3) and e)(1).
c.	OAC rule 3745-21-09(U)(2)(e)(ii)	Coating usage shall not exceed 3 gallons per day. See d)(3) and e)(1).

Draft Permit-to-Install and Operate

Verantis Corporation

Permit Number: P0108005

Facility ID: 0247070873

Effective Date: To be entered upon final issuance

d.	OAC rule 3745-31-05(D)(1)(b)	See b)(2)a, b)(2)b, d)(2), e)(3) and e)(4).
e.	ORC 3704.03(T)	The requirements of this rule are equivalent to the requirements in b)(1)c.

(2) Additional Terms and Conditions

- a. The emissions of each individual hazardous air pollutant (HAP) from emissions units K001, K002, K003 and K004, combined, shall not exceed 9.9tons per year, based upon a rolling, 12-month summation.
- b. The emissions of total combined HAPs from emissions units K001, K002, K003 and K004, combined, shall not exceed 24.9tons per year, based upon a rolling, 12-month summation.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- (2) The permittee shall collect and record the following information each month:
 - a. For this emissions unit (K001):
 - i. the name and identification number of each coating and cleanup material, as applied;
 - ii. the volume, in gallons, of each coating and cleanup material, as applied;
 - iii. the cumulative total volume of coating and cleanup materials employed, in gallons, during the past 12 rolling months;
 - iv. the individual HAP content for each HAP in each coating and cleanup material, as applied, in pounds per gallon;
 - v. the combined HAPs content for total HAPs in each coating and cleanup material, as applied, in pounds per gallon;
 - vi. the total individual HAP emissions for this emissions unit [summation of (a.iii x a.iv) for each individual HAP for all coatings and cleanup materials]; and
 - vii. the total combined HAPs emissions for this emissions unit [summation of (a.iii x a.v) for combined HAPs for all coatings and cleanup materials].

- b. For reinforced plastic lay-up operations (emissions unit K002 and K003) and chop spray gun operations (emissions unit K004):
 - i. the total individual HAP emissions; and
 - ii. the total combined HAPs emissions.
 - c. The total HAP emissions for all emissions units of each individual HAP and total combined HAPs [summations of a.vi and b.i for each individual HAP, and of a.vii and b.ii for all combined HAPs, as emitted by emissions units K001, K002, K003, and K004] per rolling, 12-month period.
- (3) The permittee shall collect and record the following information for each day for this emissions unit (K001):
- a. the name and identification number of each coating;
 - b. the volume, in gallons, of each coating employed; and
 - c. the total volume, in gallons, of all of the coatings employed.
- e) Reporting Requirements
- (1) The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing that this emissions unit employed more than the applicable maximum daily coating usage limit (3 gallons per day). The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 45 days after the exceedance occurs.
 - (2) The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 45 days after the event occurs.
 - (3) The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month emissions of any individual HAP from all emissions units at the facility exceeded 9.9tons per year, and the actual rolling, 12-month emissions of each such individual HAP for each such month.
 - (4) The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month emissions of total combined HAPs from all emissions units at the facility exceeded 24.9 tons per year, and the actual rolling, 12-month emissions of total combined HAPs for each such month.
 - (5) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization Section of this permit. The permittee shall submit the PER in the form and manner provided by the Director of the Ohio EPA by the due date identified in the Authorization Section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in Section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Coating usage shall not exceed 3 gallons per day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3).

b. Emission Limitation:

The emissions of each individual HAP from emissions units K001, K002, K003 and K004, combined, shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2).

c. Emission Limitation:

The emissions of total combined HAPs from emissions units K001, K002, K003 and K004, combined, shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2).

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group -Reinforced plastic lay-up: K002,K003,K004,

EU ID	Operations, Property and/or Equipment Description
K002	Impeller lay-up dept. bldg. #2
K003	Fan blower body lay-up dept. bldg. #3
K004	Chop spray gun operation with non-atomized chop spray of resin/glass for molded and flat sheet lay-up

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

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

a. b)(1)e, d)(5), d)(6), d)(7), d)(8) and e)(6)

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

a. b)(1)a, b)(2)a, b)(2)b, d)(1), e)(1) and e)(2)

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(D)(1)(b)	See b)(2)a, b)(2)b, d)(1), e)(1) and e)(2).
b.	OAC rule 3745-21-25(D)(1)	Work practice standards 2, 3 and 5 in Table 1. See b)(2)c, b)(2)d and b)(2)e.
c.	OAC rule 3745-21-25(D)(2)	Table 2 volatile organic compounds (VOC) emission limitations: VOC emissions from open molding, tooling gel coat shall not exceed 440 pounds of VOC per ton of gel coat based on a rolling, 12-month average (Table 2, Type of operation 6.a). VOC emissions from open molding: corrosion resistant and/or high strength

Draft Permit-to-Install and Operate

Verantis Corporation

Permit Number: P0108005

Facility ID: 0247070873

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>(CR/HS) mechanical resin application shall not exceed 113 pounds of VOC per ton of resin based on a rolling, 12-month average (Table 2, Type of operation 1.a).</p> <p>VOC emissions from open molding: corrosion resistant and/or high strength (CR/HS) manual resin application shall not exceed 123 pounds of VOC per ton of resin based on a rolling, 12-month average (Table 2, Type of operation 1.c).</p> <p>See b)(2)f, d)(3) and e)(3).</p> <p>Table 4 monomer content limitation:</p> <p>Meet the VOC emission limitations for CR/HS resins, non-atomized mechanical and use the same resin type with the monomer content limit of 46.4 percent, by weight, for manual application (Table 4, Type of operation 2).</p> <p>See b)(2)f, d)(2) and e)(3).</p>
d.	ORC 3704.03(T)	The requirements of this rule are equivalent to the requirements in b)(1)b and b)(1)c.
e.	ORC 3704.03(F)(4)(c)	See d)(5), d)(6), d)(7), d)(8) and e)(6).

(2) Additional Terms and Conditions

- a. The emissions of each individual hazardous air pollutant (HAP) from emissions units K001, K002, K003 and K004, combined, shall not exceed 9.9tons per year, based upon a rolling, 12-month summation.
- b. The emissions of total combined HAPs from emissions units K001, K002, K003 and K004, combined, shall not exceed 24.9tons per year, based upon a rolling, 12-month summation.
- c. Cleaning operation – The permittee shall not use cleaning solvents (cleaners) that have a VOC content greater than 0.42 pound VOC per gallon, except cleaners used in closed systems and used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.

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- d. VOC-containing materials storage operation – The permittee shall keep containers that store VOC-containing materials closed or covered except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety.
 - e. All mixing operations – The permittee shall comply with the following work practice standards for all mixing operations:
 - i. use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1.0 inch are permissible around mixer shafts and any required instrumentation;
 - 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; and
 - iii. keep mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
 - f. The permittee shall demonstrate compliance with the limits in b)(1)c of these terms and conditions by using the compliance options in d)(2) and/or d)(3).
- c) Operational Restrictions
- (1) None
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each month:
 - a. For each of these emissions units (K002, K003 and K004):
 - i. the company identification for each lay-up material (resin and gel coat) and cleanup material employed;
 - ii. the number of pounds of each lay-up material (resin and gel coat) employed;
 - iii. the monomer (styrene) content of each lay-up material (resin and gel coat), in percent by weight;
 - iv. the emission factor of each lay-up material (resin and gel coat), in pounds of monomer (styrene) emitted per ton of resin or gel coat processed (based on the styrene content of the resin or gel coat and the application type, per Table 1 from 40 CFR Part 63, Subpart WWWW);
 - v. the number of gallons of each cleanup material employed;
 - vi. the individual HAP content for each HAP in each cleanup material, in pounds per gallon;

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- vii. the combined HAPs content for total HAPs in each cleanup material, in pounds per gallon;
 - viii. the total individual HAP (styrene) emissions for these emissions units [summation of a.ii x a.iv ÷ 2000 lb/ton] for all lay-up materials (resins and gel coats) employed, in pounds per month;
 - ix. the total individual HAP emissions for these emissions units [summation of (a.v x a.vi)] for each individual HAP for all cleanup materials, in pounds per month;
 - x. the total combined HAPs emissions for these emissions units [summation of (a.v x a.vii)] for combined HAPs for all cleanup materials, in pounds per month;
 - xi. the total individual HAP emissions for these emissions units [summation of (a.viii + a.ix)] for each individual HAP emitted from all lay-up materials (resins and gel coats) and cleanup materials, in pounds per month; and
 - xii. the total combined HAPs emissions for these emissions units [summation of (a.viii + a.x)] for combined HAPs emitted from all lay-up materials (resins and gel coats) and cleanup materials, in pounds per month.
- b. For painting operations (emissions unit K001):
- i. the total individual HAP emissions; and
 - ii. the total combined HAPs emissions.
- c. The total HAPs emissions for all emissions units of each individual HAP and total combined HAPs [summations of a.xi and b.i for each individual HAP, and of a.xii and b.ii for total combined HAPs, as emitted by emissions units K001, K002, K003 and K004] per rolling, 12-month period.
- (2) The permittee shall collect and record the following information for each month for the purpose of demonstrating compliance with the resin monomer content limitation in b)(1)c of these terms and conditions:
- a. an identification of each resin employed;
 - b. the monomer content of each resin, as a weight percent, determined using information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), including the procedures in OAC rule 3745-21-25(E)(2), as applicable;
 - c. the application method (mechanical resin application or manual resin application) for each resin employed;
 - d. the number of pounds of each resin employed for each application method; and

- e. the rolling, 12-month weighted average monomer contents for mechanical resin application and manual resin application determined in accordance with OAC rule 3745-21-25(G)(4)(b).

[Note, any resins for which the permittee claims compliance under the option in paragraphs (G)(4)(a) and (G)(4)(b) of OAC rule 3745-21-25 shall not be included in any of the averaging calculations described in paragraph (G)(2) or (G)(3) of this rule.]

- (3) The permittee shall collect and record the following information for each month for the purpose of demonstrating compliance with the tooling gel coat VOC emissions limitation and the resin VOC emissions limitations in b)(1)c of these terms and conditions:

- a. an identification of each resin and gel coat employed;
- b. the monomer content of each resin and gel coat, as a weight percent, determined using information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), including the procedures in OAC rule 3745-21-25(E)(2), as applicable;
- c. VOC emission factors calculated using Table 1 of 40 CFR Part 63, Subpart WWWW as follows:
 - i. for open molding, tooling gel coat, use equation 1.f. (atomized spray gel coat application, nonvapor-suppressed gel coat);
 - ii. for open molding, CR/HS, mechanical resin application, use equation 1.c.i. (nonatomized mechanical resin application, nonvapor-suppressed resin); and
 - iii. for open molding, CR/HS, manual resin application, use equation 1.a.i. (manual resin application, nonvapor-suppressed resin);
- d. the application method (tooling gel coat or mechanical resin application or manual resin application) for each resin and gel coat employed;
- e. the number of pounds of each resin and gel coat employed for each application method; and
- f. the rolling, 12-month average (and/or weighted average) VOC emission factor(s) (and/or weighted average VOC emissions limitation) determined in accordance with OAC rule 3745-21-25(G)(1), (G)(2) and/or (G)(3).

[Note, when using compliance option in OAC rule 3745-21-25(G)(2), the permittee should not include process streams for which the permittee will demonstrate compliance using the procedures in paragraph (G)(4) of OAC 3745-21-25.]

- (4) The permittee shall maintain all records, including the following, for a period of not less than 5 years:

- a. a copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25;

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- b. all data, assumptions, and calculations used to determine monomer contents and VOC emissions factors; and
 - c. a certified statement that operations are in compliance with the work practice standards specified in Table 1 of OAC rule 3745-21-25, as applicable.
- (5) The federally enforceable permit-to-install and operate (FEPTIO) for emissions unit, K004, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each of the toxic air contaminants emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. The exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each of the toxic compounds emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. Threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit, i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminants:

Toxic Contaminant: styrene

TLV (ug/m3): 85,202

Maximum Hourly Emission Rate (lbs/hr): 3.704

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4047

MAGLC (ug/m3): 4733.5

The permittee has demonstrated that emissions of styrene from emissions unit K004, are calculated to be equal or greater than eighty percent, but less than 100 percent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- (6) Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the changes to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. Changes in the composition of the materials used or the use of new materials that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a “modification” under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):
- a. A description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. The Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);
 - c. A copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. The documentation of the initial evaluation of compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (8) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month emissions of any individual HAP from all emissions units at the facility exceeded 9.9tons per year, and the actual rolling, 12-month emissions of each such individual HAP for each such month.
 - (2) The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month emissions of total combined HAPs from all emissions units at the facility exceeded 24.9tons per year, and the actual rolling, 12-month emissions of total combined HAPs for each such month.
 - (3) The permittee shall submit semiannual compliance status reports containing the following information:
 - a. Company name and address.
 - b. 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. Date of the report and beginning and ending dates of the reporting period.
- d. If there are no deviations from any VOC emissions limitations and operating limits that apply and there are no deviations from the work practice standards in b)(2)c, b)(2)d and b)(2)e of these terms and conditions, a statement that there were no deviations from VOC emissions limitations, operating limits, or work practice standards during the reporting period.
- e. For each deviation from a VOC emissions limitation or operating limit and for each deviation from a work practice standard, the compliance report shall contain the following information:
 - i. the total operating time of each affected operation during the reporting period; and
 - ii. information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
- f. Where multiple compliance options are available, the permittee shall state in this compliance report if the permittee has changed compliance options since the last compliance report.

Each compliance report shall cover the semiannual reporting period from January 1st through June 30th and the semiannual reporting period from July 1st through December 31st, and shall be submitted to Ohio EPA Northeast District Office by July 30th and January 30th.

- (4) The permittee shall report if the facility exceeded the 100 tons of VOC per year emissions threshold if that exceedance would make the facility subject to paragraph (D)(3) of OAC rule 3745-21-25. The report shall be submitted to the Director (the Ohio EPA Northeast District Office) by whichever date comes first after the facility's determination that it met or exceeded the VOC threshold: July 31 or January 31.
- (5) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization Section of this permit. The permittee shall submit the PER in the form and manner provided by the Director of the Ohio EPA by the due date identified in the Authorization Section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.
- (6) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in Section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The emissions of each individual HAP from emissions units K001, K002, K003 and K004, combined, shall not exceed 9.9tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

b. Emission Limitation:

The emissions of total combined HAPs from emissions units K001, K002, K003 and K004, combined, shall not exceed 24.9tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

c. Emission Limitation:

Meet the VOC emissions limitations for CR/HS resins, non-atomized mechanical and use the same resin type with the monomer content limit of 46.4 percent, by weight, for manual application (Table 4, Type of operation 2).

Applicable Compliance Method:

Compliance with the monomer content limit of 46.4 percent, by weight, of resin shall be demonstrated by maintaining an average monomer content value less than or equal to 46.4 percent on a rolling, 12-month weighted average and/or by using resins that individually meet the monomer content limit of 46.4 percent, by weight, of resin. See d)(2) and d)(3).

d. Emission Limitation:

VOC emissions from open molding, tooling gel coat shall not exceed 440 pounds of VOC per ton of gel coat based on a rolling, 12-month average (Table 2, Type of operation 6.a).

Applicable Compliance Method:

Compliance with the VOC emissions limitation of 440 pounds per ton for tooling gel coat shall be demonstrated by maintaining a VOC emissions factor value less than or equal to 440 pounds per ton on a rolling, 12-month average (and/or weighted average) and/or by using tooling gel coats that individually meet the VOC emission limitation of 440 pounds per ton. See d)(2) and d)(3).

e. Emission Limitation:

VOC emissions from open molding: corrosion resistant and/or high strength (CR/HS) mechanical resin application shall not exceed 113 pounds of VOC per ton of resin based on a rolling, 12-month average (Table 2, Type of operation 1.a).

Applicable Compliance Method:

Compliance with the VOC emissions limitation of 113 pounds per ton for CR/HS mechanical resin application shall be demonstrated by maintaining a VOC emissions factor value less than or equal to 113 pounds per ton on a rolling, 12-month average (and/or weighted average) and/or by using CR/HS mechanical application resins that individually meet the VOC emission limitation of 113 pounds per ton. See d)(2) and d)(3).

f. Emission Limitation:

VOC emissions from open molding: corrosion resistant and/or high strength (CR/HS) manual resin application shall not exceed 123 pounds of VOC per ton of resin based on a rolling, 12-month average (Table 2, Type of operation 1.c).

Applicable Compliance Method:

Compliance with the VOC emissions limitation of 123 pounds per ton for CR/HS manual resin application shall be demonstrated by maintaining a VOC emissions factor value less than or equal to 123 pounds per ton on a rolling, 12-month average (and/or weighted average) and/or by using CR/HS manual application resins that individually meet the VOC emission limitation of 123 pounds per ton. See d)(2) and d)(3).

g) Miscellaneous Requirements

- (1) The permittee submitted an applicability notification report, initial compliance report and initial semiannual compliance report on April 19, 2011, in accordance with OAC rule 3745-21-25(F)(4) and (S)(1).