



Environmental Protection Agency

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

6/8/2012

Certified Mail

Sandy Brackins
Ershigs FRP Production Facility (DP&L-Stuart)
9120 NE Vancouver Mall Loop
Suite 260
Vancouver, WA 98662

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0701000070
Permit Number: P0110225
Permit Type: Administrative Modification
County: Adams

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

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 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 Portsmouth City Health Dept., Air Pollution Unit. 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.

Sincerely,

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

Cc: U.S. EPA
Portsmouth; Kentucky; West Virginia



FINAL

Division of Air Pollution Control
Permit-to-Install
for
Ershigs FRP Production Facility (DP&L-Stuart)

Facility ID:	0701000070
Permit Number:	P0110225
Permit Type:	Administrative Modification
Issued:	6/8/2012
Effective:	6/8/2012



Division of Air Pollution Control
Permit-to-Install
for
Ershigs FRP Production Facility (DP&L-Stuart)

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. Federally Enforceable Standard Terms and Conditions 4
2. Severability Clause 4
3. General Requirements 4
4. Monitoring and Related Record Keeping and Reporting Requirements 5
5. Scheduled Maintenance/Malfunction Reporting 6
6. Compliance Requirements 6
7. Best Available Technology 7
8. Air Pollution Nuisance 7
9. Reporting Requirements 7
10. Applicability 8
11. Construction of New Sources(s) and Authorization to Install 8
12. Permit-To-Operate Application 9
13. Construction Compliance Certification 9
14. Public Disclosure 9
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 10
16. Fees 10
17. Permit Transfers 10
18. Risk Management Plans 10
19. Title IV Provisions 10
B. Facility-Wide Terms and Conditions 11
C. Emissions Unit Terms and Conditions 13
1. P001, Winding Station 1 14
2. T001, Resin Storage Tank 1 22

Authorization

Facility ID: 0701000070
Facility Description: Fiberglass Reinforced Plastic (FRP) Production Facility
Application Number(s): M0001742
Permit Number: P0110225
Permit Description: Agency-initiated administrative permit modification to PTI 07-00547 to update the terms and conditions for EU's P001 and T001 due to the permanent shutdown of associated emissions units.
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 6/8/2012
Effective Date: 6/8/2012

This document constitutes issuance to:

Ershigs FRP Production Facility (DP&L-Stuart)
3105 US Highway 52
Manchester, OH 45144

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

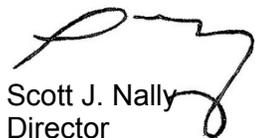
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Portsmouth City Health Dept., Air Pollution Unit
605 Washington Street
3rd Floor
Portsmouth, OH 45662
(740)353-5156

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: P0110225

Permit Description: Agency-initiated administrative permit modification to PTI 07-00547 to update the terms and conditions for EU's P001 and T001 due to the permanent shutdown of associated emissions units.

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

Emissions Unit ID:	P001
Company Equipment ID:	Winding Station 1
Superseded Permit Number:	07-00547
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T001
Company Equipment ID:	Resin Storage Tank 1
Superseded Permit Number:	07-00547
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 Portsmouth City Health Dept., Air Pollution Unit.

- (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 Portsmouth City Health Dept., Air Pollution Unit. 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 Portsmouth City Health Dept., Air Pollution Unit 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 Portsmouth City Health Dept., Air Pollution Unit 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 Portsmouth City Health Dept., Air Pollution Unit 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 Portsmouth City Health Dept., Air Pollution Unit.
- 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 Portsmouth City Health Dept., Air Pollution Unit. 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 following emissions unit contained in this permit are subject to 40 CFR Part 63, Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production: P001, T001.

The complete MACT requirements, including the MACT General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov>.

C. Emissions Unit Terms and Conditions

1. P001, Winding Station 1

Operations, Property and/or Equipment Description:

Winding Station 1 consisting of one winding machine and mandrel, one chopper gun, one 4.0 square foot resin bath, and two 500-gallon resin day tanks with electric heaters.

Administrative modification to PTI 07-00547 to remove references to permanently shutdown emission units (P002 and P003).

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)	<p>Volatile organic compounds (VOC) emissions from this emissions unit for the resin and catalyst shall not exceed 47.74 pounds per hour.</p> <p>VOC emissions from this emissions unit from the cleanup material shall not exceed 18.2 pounds per hour.</p> <p>See b)(2)b and b)(2)d.</p> <p>The requirements of this rule also includes compliance with the requirements of OAC rule 3745-31-05(D) and 40 CFR Part 63, Subpart WWWW.</p>
b.	OAC rule 3745-31-05(D)	See b)(2)a.
c.	OAC rule 3745-21-07(M)(5)(e)	In accordance with OAC rule 3745-21-07(M)(5)(e), Best Available Technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(M).



d.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 - 5935)</p> <p>[In accordance with 40 CFR 63.5790(b), this emissions unit is an 'open molding' operation at a new reinforced plastics composite production facility subject to the emission limitations /control requirements specified in this section.]</p>	<p>Standards – 40 CFR 63.5805(b) – See b)(2)c.</p> <p>See b)(2)c, c)(6)e, d)(6), e)(7) and f(2).</p>
e.	<p>40 CFR 63.1-15 (40 CFR 63.5925)</p>	<p>Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1-15 apply.</p>

(2) Additional Terms and Conditions

- a. The VOC emissions from emissions units P001, including cleanup material, shall not exceed 39.70 tons per year, based upon a rolling, 12-month summation of VOC emissions.
- b. This hourly allowable represents the maximum production capacity of this emissions unit; therefore, no hourly monitoring or record keeping is required to demonstrate compliance.
- c. The company shall comply with (or have complied with, as applicable) the following applicable requirements under 40 CFR Part 63, Subpart WWWW:

63.5805(c) and 63.5835	Compliance with the standards in this subpart must be met by the dates specified in Table 2 of this subpart.
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- d. For the purposes of this permit, all organic compound (OC) emissions and hazardous air pollutant (HAP) emissions are considered VOC emissions. VOC emissions include the HAP: styrene.

c) Operational Restrictions

- (1) The maximum styrene monomer weight percent, as applied, for each resin employed in this emissions unit shall not exceed forty-one percent (41%).
- (2) The VOC content of the cleanup material employed shall not exceed 9.1 lb VOC/gallon, as applied.
- (3) The permittee shall utilize non-atomized application equipment for mechanical and filament winding resin application in this emissions unit.

- (4) The permittee shall only employ vapor suppressant resins.
- (5) The volatile organic materials stored and used in emissions unit P001, including cleanup material, shall not cause VOC emissions to exceed 39.70 tons/yr, based upon a rolling, 12-month summation of VOC emissions. These VOC emissions shall be determined in accordance with section d) of these terms and conditions.
- (6) The permittee shall comply with each of the following during cleanup solvent operations:
- a. Solvent-laden applicators (e.g., rags) shall be placed in closed containers immediately after use, and the containers must be kept closed at all times except when depositing or removing the materials from the container.
 - b. Solvent cleanup basins shall be closed at all times when not in use.
 - c. Solvent containers for soaking tools and applicators must be kept closed at all times except when depositing or removing the items from the containers.
 - d. All cleanup solvents shall be stored, transported, and disposed of in closed containers.
 - e. All cleanup solvents shall be limited to non-chemically photo reactive materials.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain monthly records of the following information for resins employed in emissions unit P001:
- a. the name and identification of each resin;
 - b. documentation that each resin employed was a vapor suppressant resin;
 - c. the mass of each resin employed (M_r), in tons;
 - d. the weight fraction of styrene monomer (in percent) for each resin, as applied;
 - e. calculation of the styrene emissions (E_r) from resin usage for each resin application technique using the following equation:

$$E_r = \sum_{i=1}^n M_{r,i} UEF$$

where:

n = number of resins employed; and
 UEF = United Emission Factor for open molding of composites based on the styrene content of the resin and the resin application method taken from the following table:



Table 1. Unified Emission Factors for Open Molding of Composites, ACMA, July 23, 2001

Styrene Content in resin, %	35	36	37	38	39	40	41
Manual	94.4	100.1	106	111.6	117.3	123	128.7
Manual w/ Vapor Suppressed Resin VSR	Manual emission factor [listed above] x (1 - (0.50 x specific VSR reduction factor for each resin/suppressant formulation))						
Mechanical Non-Atomized	76.9	80	83.2	86.3	89.5	92.6	95.7
Mechanical Non-Atomized with VSR	Mechanical Non-Atomized emission factor [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))						
Filament Application with VSR	86.2	89.8	93.3	96.9	100.5	104.1	107.6

- (2) The permittee shall maintain monthly records of the following information for catalysts employed in emissions unit P001:
- a. the company identification for each catalyst;
 - b. the volume of each catalyst employed (V_c), in gallons;
 - c. the VOC content of each catalyst ($C_{c,VOC}$), in pounds per gallon;
 - d. calculation of the VOC emissions from catalyst usage, using the following equations:

$$E_{c,VOC} = \sum_{i=1}^n V_c C_{c,VOC}$$

where:

n = number of catalysts employed.

- (3) The permittee shall maintain monthly records of the following information for cleanup materials employed in emissions unit P001:
- a. the name and identification for each cleanup material employed;
 - b. the volume of each cleanup material employed (V_s), in gallons;
 - c. the VOC content of each cleanup material employed (C_s), in pounds per gallon;

- d. calculation of the VOC emissions from cleanup material usage (E_s), using the following equation:

$$E_s = \sum_{i=1}^n V_s C_s$$

where:

n = number of cleanup materials employed;

- e. The permittee may calculate VOC emissions from cleanup materials in accordance with the following formula if waste cleanup materials are sent off site for disposal/reclamation:

VOC emissions = (total gallons of cleanup material used) x (solvent density of cleanup material) - (total gallons of cleanup material sent off site [minus solids]) x (solvent density of cleanup material).

- (4) The permittee shall calculate and maintain monthly records of the following information for emissions unit P001:
- a. the permittee shall record the cumulative VOC emission rates from cleanup material, catalyst, and resin on a rolling, 12-month summation of the VOC emission rates. These calculations shall be performed in accordance with section f)(1)c of these terms and conditions.
- (5) The permittee shall maintain documentation that non-atomized application equipment was employed for mechanical and filament winding resin application at the facility.
- (6) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart WWWW, including the following sections:

63.5895	Monitoring and Recordkeeping for continuous compliance
63.5900(a)	Continuous compliance methods
63.5915	Records that must be kept
63.5920	In what form and for how long records must be kept

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify the number of pounds of noncomplying resin (i.e., weight fraction of styrene monomer in excess of 41%) employed.
- (2) The permittee shall submit deviation (excursion) reports that identify the number of pounds of cleanup material with a VOC content in excess of 9.1 lbs/gallon.

- (3) The permittee shall submit deviation (excursion) reports that identify all exceedances of the combined rolling, 12-month VOC emissions limitation of 39.70 tons/yr from emissions unit P001.
- (4) The permittee shall submit deviation (excursion) reports that identify any use of atomized spray equipment for mechanical and filament winding resin application.
- (5) The permittee shall submit deviation (excursion) reports that identify any use of resins that did not meet the definition of vapor suppressant resin.
- (6) These deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (7) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR Part 63, Subpart WWWW, including the following sections:

63.5905	Notifications requirements – See Table 13 of this subpart
63.5910(a-d and f-h)	Reporting requirements – See Table 14 of this subpart

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. Emissions Limitation:

VOC emissions from this emissions unit for the resin and catalyst shall not exceed 47.74 pounds per hour.

Applicable Compliance Method:

- i. Calculation of the VOC emissions (E_f) based on emissions from resin usage (E_r), and emissions from catalyst usage (E_c) using the following equation:

$$E_f = E_r + E_c$$

- ii. Calculation of the VOC emissions from resin usage (E_r) using data from section d)(1) and the following equation:

$$E_r = \left(\frac{M_r}{2000} UEF \right)_{Manual} + \left(\frac{M_r}{2000} UEF \right)_{Filament} + \left(\frac{M_r}{2000} UEF \right)_{Mechanical}$$

where:

n = number of resins employed;

M_r = maximum hourly resin usage of 344.8 lb/hr for mechanical, 624.5 lb/hr for filament, and 30.7 lb/hr for manual application;

UEF = 71.18 lbs/ton for non-atomized mechanical application with vapor suppression, 92.03 lb/ton for manual application with vapor suppression, and 107.62 lb/ton for filament application with vapor suppression (taken from Table 1, Unified Emission Factors for Open Molding of Composites, ACMA July 23, 2001 using a VSR of 57%); and

E_r = (30.7 lb resin/hr / 2000 lb/ton x 92.03 lb VOC/ton resin) + (344.8 lb resin/hr / 2000 lb/ton x 71.18 lb HAP/ton) + (624.5 lb resin/hr / 2000 lb/ton x 107.62 lb VOC/ton resin).

E_r = 47.29 lb VOC/hr

- iii. Calculation of the VOC emissions from catalyst usage (E_c) using data from section d)(2) and the following equation:

$$E_{c,VOC} = V_c C_{c,VOC}$$

where:

V_c = the maximum hourly volume of catalyst employed = 1.62 gal/hr; and

$C_{c,HAP}$ = the maximum organic HAP/VOC content of catalyst employed = 0.278 lb/gal.

E_c = 1.62 gal/hr x 0.278 lb VOC/gal

E_c = 0.45 lb VOC/hr

Thus,

E_f = 47.29 lbVOC/hr + 0.45 lbVOC/hr

E_f = 47.74 lbVOC/hr

- b. Emission Limitation:

VOC emissions from this emissions unit from the cleanup material shall not exceed 18.2 pounds per hour.

Applicable Compliance Method:

Calculation of the VOC emissions from cleanup material usage (E_s) using data from section d)(3) and the following equation:

$$E_s = V_s C_s$$

where:

V_s = the maximum hourly volume of cleanup material employed = 2.0 gal/hr; and

C_s = the maximum VOC content of cleanup material employed = 9.1 lb VOC/gal.

c. Emission Limitation:

The VOC emissions from emissions units P001, including cleanup material, shall not exceed 39.70 tons per year, based upon a rolling, 12-month summation of VOC emissions.

Applicable Compliance Method:

Compliance of VOC emissions for emissions unit P001 shall be determined in accordance with monitoring and record keeping found in sections d)(1), d)(2) and d)(3) above.

- (2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR 63 Subpart WWWW, including the following sections:

63.5796	Emission factor equations
63.5797	Determining organic HAP content of coatings
63.5799	Calculating organic HAP emissions

g) Miscellaneous Requirements

- (1) None.



2. T001, Resin Storage Tank 1

Operations, Property and/or Equipment Description:

10,000 gallon fixed roof resin storage tank 1 with permanent submerged fill pipe

Administrative modification to PTI 07-00547 to remove references to permanently shutdown emission units (T002 and T003).

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)	<p>Volatile organic compounds (VOC) emissions from the emissions unit shall not exceed 0.005 pound per hour and 0.022 ton per year.</p> <p>See b)(2)a through b)(2)c.</p>
b.	<p>40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 - 5935)</p> <p>[In accordance with 40 CFR 63.5790(b), this emissions unit is an existing HAP containing material storage part of an 'open molding' affected source subject to the emission limitations /control requirements specified in this section.]</p>	Table 4 to Subpart WWWW of 40 CFR Part 63 – Work Practice Standards apply.
c.	40 CFR 63.1-15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1-15 apply.



(2) Additional Terms and Conditions

- a. The storage vessel shall be equipped with a permanent submerged fill pipe.
b. The hourly and annual allowables represent the maximum production capacity of this emissions unit; therefore, no monitoring or record keeping is required to demonstrate compliance.
c. For the purposes of this permit, all organic compound (OC) emissions and HAP emissions are considered VOC emissions. VOC emissions include the HAP: styrene.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR Part 63, Subpart WWWW, including the following sections:

Table with 2 columns: CFR Section, Description. Row 1: 63.5915, Records that must be kept. Row 2: 63.5920, In what form and for how long records must be kept.

e) Reporting Requirements

- (1) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as required pursuant to 40 CFR Part 63, Subpart WWWW, including the following sections:

Table with 2 columns: CFR Section, Description. Row 1: 63.5910(a-d and f-h), Reporting requirements – See Table 14 of this subpart.

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. Emissions Limitation:

VOC emissions from the emissions unit shall not exceed 0.005 pound per hour and 0.022 ton per year.

Applicable Compliance Method:

The permittee shall demonstrate compliance using the potential to emit of this emissions unit as calculated in the PTI application. The potential to emit is based upon the latest version of the TANKS program, the maximum tank material throughput, and the assumption the tank contains 100% styrene. The annual emissions shall be multiplied by 2000 lbs/ton and divided by 8760 hrs/yr to obtain the hourly emission limitation.

- g) Miscellaneous Requirements
 - (1) None.