Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

10/17/2012

Certified Mail

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

Mr. Sean Madden
Rochling Glastic Composites
4321 Glenridge Road
Cleveland, OH 44121

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1318544510
Permit Number: P0110908
Permit Type: Initial Installation
County: Cuyahoga

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 Cleveland Division of Air Quality. 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
CDAQ; Pennsylvania; Canada

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Rochling Glastic Composites

Facility ID:	1318544510
Permit Number:	P0110908
Permit Type:	Initial Installation
Issued:	10/17/2012
Effective:	10/17/2012

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Rochling Glastic Composites

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 15
1. Emissions Unit Group -Pultrusion Press Group 6: P073,P074, ... 16

Authorization

Facility ID: 1318544510
Facility Description: Plastic products NEC
Application Number(s): A0045408
Permit Number: P0110908
Permit Description: Initial PTI for two pultrusion presses, P073 and P074. The pultrusion presses include a bath section, heated die and curing section, and a cut-off saw. Particulate emissions from the units are controlled by a central baghouse.
Permit Type: Initial Installation
Permit Fee: $400.00
Issue Date: 10/17/2012
Effective Date: 10/17/2012

This document constitutes issuance to:

Rochling Glastic Composites
4321 Glenridge Road
South Euclid, OH 44121-2891

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:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

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: P0110908
Permit Description: Initial PTI for two pultrusion presses, P073 and P074. The pultrusion presses include a bath section, heated die and curing section, and a cut-off saw. Particulate emissions from the units are controlled by a central baghouse.

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

Group Name: Pultrusion Press Group 6

Emissions Unit ID:	**P073**
Company Equipment ID:	P073
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P074**
Company Equipment ID:	P074
Superseded Permit Number:	
General Permit Category andType:	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 Cleveland Division of Air Quality.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, 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 Cleveland Division of Air Quality. 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, andreportingrequirements contained in this permit shall be submitted (i.e., postmarked) to the Cleveland Division of Air Quality 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 Cleveland Division of Air Quality 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 Cleveland Division of Air Quality 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 Cleveland Division of Air Quality.

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 Cleveland Division of Air Quality. 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 enteredupon 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. Applicable Emissions Limitations and/or Control Requirements

   a) Emissions from this facility 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
(1)	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 - 5935)	Organic hazardous air pollutants (Organic HAPs) shall not exceed emissions standards as specified in 40 CFR 63.5805, Subpart WWWW. See 2.b)(1). below.
(2)	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Work practice standards must be followed in accordance with the applicable portions of 40 CFR 63.5805, Table 4.
(3)	40 CFR Part 63.1 through 63.15, Subpart A.	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

   b) Additional Terms and Conditions

      (1) This facility is subject to the requirements of 40 CFR Part 63, Subpart WWWW – National Emission Standards for Hazardous Air Pollutants for Specific Open Molding, Centrifugal Casting, Pultrusion, and Continuous Lamination/Casting Operations. The permittee shall comply with the applicable emission limitations and operational restrictions specified in 40 CFR Part 63.5780 to 63.5935. 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:www.ecfr.gpoaccess,gov or by contacting the Cleveland Division of Air Quality (Cleveland DAQ).

   c) Operational Restrictions

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

63.5805	Table 4 – work practice standards.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR, Part 63, Subpart WWWW]

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:

63.5895(c) – (d)	Records of resin use, organic HAP content, operation, and application methods.
63.5915(a)	Copy of compliance notification(s) and report(s).
63.5915(c)	Records of all calculations and data used to determine organic HAP emission factors; or Average organic HAP content for operations listed in Tables 3, 5, and 7 of the subpart.
63.5915(d)	Certified statement of compliance with work practice requirements.
63.5920(a) – (d)	Recordkeeping format and retention requirements.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR, Part 63, Subpart WWWW]

e) Reporting Requirements

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

63.905(b)	15-day notification of changes.
63.5910(a) – (b) and Table 14	Semi-annual compliance reports.
63.5910(c) – (i) and Table 14	Content of semi-annual compliance reports.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR, Part 63, Subpart WWWW]

f) Testing Requirements

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

a. The permit shall comply with the applicable compliance requirements under 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5900	Demonstration of continuous compliance.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Pultrusion Press Group 6: P073,P074,

EU ID	Operations, Property and/or Equipment Description
P073	Pultrusion press with a bath section, heated die and curing section, and a cut-off saw. Emissions unit controlled by a central dust collector.
P074	Pultrusion press with a bath section, heated die and curing section, and a cut-off saw. Emissions unit controlled by a central dust collector.

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.	ORC 3704.03(F)	Fugitive volatile organic compound (VOC) emissions shall not exceed 3.55 lbs/hr and 15.55 tons/year from each pultrusion line. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW.
b.	OAC rule 3745-31-05(F)	The total particulate emissions from the central dust collector shall not exceed 0.97 lb/hr and 4.25 tons/year. Fugitive OC emissions shall not exceed 2.56 tons/year from emissions units P023, P026, P027, P028, P029, P030, P032, P033, P035, P036, P037, P038, P039, P040, P065, P073, and P074. See b)(2)a. below.
c.	OAC rule 17-07(A)(1)	Visible particulate emissions from the dust collector stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(B)	The particulate emission limitation specified by this rule is less stringent than the particulate emission limitation established by OAC rule 3745-31-05(F).
e.	OAC rule 3745-21-25	The requirements of this rule are equivalent to the MACT requirements in 40 CFR Part 63, Subpart WWWW.
f.	40 CFR Part 63, Subpart WWWW	The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production) as specified in Section B.

(2) Additional Terms and Conditions

a. The particulate emissions from the emission units shall be vented to the central dust collector that controls the particulate emissions from all of the emissions units at this facility.

b. The VOC emission factors used to calculate the VOC emissions were established by the permittee. Should more accurate emission factors be developed in the future, the permittee shall use them, provided the emission factors are mutually agreeable between the Ohio EPA, the Cleveland DAQ, and Glastic Corporation, South Euclid Facility.

c. The emission of organic material from the pultrusion lines consist of styrene, a photochemically reactive material and hazardous air pollutant (HAP).

c) Operational Restrictions

(1) The permittee shall operate the dust collector whenever the emissions units are in operation. The permittee shall maintain the dust collector in accordance with the manufacturer's recommendations, instructions, and/or operating manuals, with any modifications deemed necessary by the permittee.

In the event that the dust collector is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired and returned to these documented operating conditions.

(2) The permittee shall keep containers that store HAP-containing materials and cleanup materials closed or covered, except during the addition or removal of materials. Bulk HAP-containing material storage tanks may be vented as necessary for safety.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain and record the following information each day when the emissions units are in operation:

a. the name of each type of pultrusion part;

b. the emission factor for each type of pultrusion part, in lbs of VOC emissions/square foot of wet area/hr;

c. the wet area for each type of pultrusion part, in square feet;

d. the VOC emissions for each type of pultrusion part, in lbs [(b) x (c)]

e. the total VOC emissions from all pultrusion parts in lbs [summation of (d) for all pultrusion parts made];

f. the total number of hours each emissions unit was in operation; and

g. the average hourly VOC emission rate, in lbs/hr (e/f); and

(2) The permittee shall maintain monthly records of the following information for the cleanup material usage for emission units P023, P026, P027, P028, P029, P030, P032, P033, P035, P036, P037, P038, P039, P040, P065, P073, and P074:

a. the volume of each cleanup material dispensed, in gallons;

b. the volume of each cleanup material returned, in gallons;

c. the volume of each evaporated cleanup material, in gallons. This shall be calculated by subtracting the volume of each returned cleanup materials from the volume of each dispensed cleanup material [(a) – (b)];

d. the OC content for each cleanup material employed, in lbs/gallon; and

e. the OC emissions from all cleanup materials employed, in lbs [the summation of (c) x (d) for all cleanup material employed).

(3) The permittee shall maintain annual records of the total OC emissions from all cleanup material employed for the calendar year, in tons [summation of d)(2)e. for all months of the calendar year, divided by 2,000 lbs/ton].

(4) The permittee shall perform weekly checks, when the emissions units are in operation and when the weather conditions allow, for any visible PE from the dust collector stack. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to eliminate the visible emissions.

If the weekly checks show visible emissions that are representative of normal operation for 12 consecutive operating weeks, the required frequency of visible emissions checks may be reduced to monthly. If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to weekly until such time there are 12 consecutive operating weeks of normal visible emissions.

(5) The permittee shall maintain daily records that document any time period when the dust collector was not in service when the emission units were in operation.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the hourly VOC emission limitations for the emissions units was exceeded, and what the hourly VOC emissions were for each such day.

(2) The quarterly deviation (excursion) reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

(3) The permittee shall notify Cleveland DAQ in writing of any daily records showing that the dust collector was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent within 30 days after the event occurs.

(4) The permittee shall submit semiannual written reports that (a) identify all days during which any visible PE were observed from the dust collector stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Cleveland DAQ by January 31 and July 31 of each year and shall cover the previous 6-month period.

(5) The permittee shall submit annual reports to the Cleveland DAQ that specify the total VOC emissions (i.e., from all the pultrusion parts made by each unit and the cleanup material employed from all pultrusion lines) for the previous calendar year, in tons. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Reports.

(6) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitation:

Fugitive VOC emissions shall not exceed 3.55 lbs/hr from each emission unit.

Applicable Compliance Method:

The VOC emission limitation was established by the use of emission factors developed by the permittee through laboratory bench scale testing and by the calculation method outlined in d)(1).

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

b. Emission Limitation:

Fugitive VOC emissions shall not exceed 15.55 tons/year from each emission unit.

Applicable Compliance Method:

The annual VOC emission limitation was established by multiplying the hourly VOC emission limitation from each pultrusion line by 8,760 hours of operation per year, and dividing by 2,000 lbs/ton. Therefore compliance with the annual VOC emission limitation is assumed while compliance is maintained with the hourly VOC emission limitation.

c. Emission Limitation:

Fugitive VOC emissions shall not exceed 2.56 tons/year from emission units P023, P026, P027, P028, P029, P030, P032, P033, P035, P036, P037, P038, P039, P040, P065, P073, and P074.

Applicable Compliance Method:

Compliance shall be determined through the recordkeeping requirements established in d)(2) and d(3).

d. Emission Limitation:

The total PE from the central dust collector shall not exceed 0.97 lbs/hr.

Applicable Compliance Method:

The hourly PE limitation was established by the following methodology:

HER = (DCFR) x (DCEF) x (TI) x (CONV) = lb PE/hr

where:

HER = hourly emission rate (lb of PE/hr);

DCFR = dust collector flow rate (dscfm);

DCEF = dust collector efficiency (grain/dscf);

TI = time (60 minutes/hr); and

CONV = conversion factor 1 lb/7,000 grains).

If required, the permittee shall demonstrate compliance with the hourly PE limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(1).

e. Emission Limitation:

The total PE from the central dust collector shall not exceed 4.25 tons/year.

Applicable Compliance Method:

The annual PE emission limitation was established by multiplying the hourly PE emission limitation from each pultrusion line by 8,760 hours of operation per year, and dividing by 2,000 lbs/ton. Therefore compliance with the annual PE emission limitation is assumed while compliance is maintained with the hourly PE emission limitation.

f. Emission Limitation:

Visible PE from the dust collector stack shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

g) Miscellaneous Requirements

(1) Potential to emit calculations:

particulate emissions:

controlled outlet emission rate from the central dust collector:

(22,703 dscf/min) x (0.005 gr/dscf) x (60 min/hr) x (1 lb/7,000 gr) = 0.97 lb PE/hr; and

(0.97 lb PE/hr) x (8,760 hrs/yr) x (1 ton/2,000 lbs) = 4.25 TPY of PE (total for emissions units P014, P023, P026, P027, P028, P029, P030, P032, P033, P035, P036, P037, P038, P039, P040, P065, P073, and P074 that are vented to the central dust collector)