

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

11/7/2012

Certified Mail

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 1318544510  
Permit Number: P0110227  
Permit Type: Administrative Modification  
County: Cuyahoga

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

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) 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. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

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  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

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. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/dapc/pemitsurvey.aspx](http://www.epa.ohio.gov/dapc/pemitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

*Michael W. Ahern*

Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA  
CDAQ; Pennsylvania; Canada



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
RochlingGlastic Composites**

Facility ID: 1318544510  
Permit Number: P0110227  
Permit Type: Administrative Modification  
Issued: 11/7/2012  
Effective: 11/7/2012





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
RochlingGlastic Composites

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**Final Permit-to-Install**  
RochlingGlastic Composites  
**Permit Number:** P0110227  
**Facility ID:** 1318544510  
**Effective Date:** 11/7/2012

## Authorization

Facility ID: 1318544510  
Facility Description: Plastic products NEC  
Application Number(s): M0001743  
Permit Number: P0110227  
Permit Description: PTI 13-03893 will be modified in order to reflect the change in control equipment for P023, P026, P027, P028, P029, P030, P032, P033, P034, P035, P036, P037, P038, P039, and P040. Previously the above emission units were controlled by several small dust collectors. Recently the facility has installed one, central dust collector to handle all of the listed emission units. The emission unit descriptions have been adjusted to remove the old dust collector information and have been changed to reflect the new central baghouse. Various other changes have been made to the permit as well.  
Permit Type: Administrative Modification  
Permit Fee: \$3,600.00  
Issue Date: 11/7/2012  
Effective Date: 11/7/2012

This document constitutes issuance to:

RochlingGlastic Composites  
4321 Glenridge Road  
South Euclid, OH 44121-2891

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

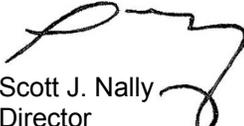
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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: P0110227

Permit Description: PTI 13-03893 will be modified in order to reflect the change in control equipment for P023, P026, P027, P028, P029, P030, P032, P033, P034, P035, P036, P037, P038, P039, and P040. Previously the above emission units were controlled by several small dust collectors. Recently the facility has installed one, central dust collector to handle all of the listed emission units. The emission unit descriptions have been adjusted to remove the old dust collector information and have been changed to reflect the new central baghouse. Various other changes have been made to the permit as well.

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

<b>Emissions Unit ID:</b>	<b>L002</b>
Company Equipment ID:	Parts washer - Cold Room
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P014</b>
Company Equipment ID:	Morehouse Mixer
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P038</b>
Company Equipment ID:	Pultrusion Line 41
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P051</b>
Company Equipment ID:	Laminate Press 16
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P059</b>
Company Equipment ID:	Laminate Press 48
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P060</b>
Company Equipment ID:	Laminate Press 49
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P063</b>
Company Equipment ID:	Tote Filling - Cold Room
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable

**Group Name: Laminate Presses**

<b>Emissions Unit ID:</b>	<b>P042</b>
Company Equipment ID:	Laminate Press 4
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable



<b>Emissions Unit ID:</b>	<b>P047</b>
Company Equipment ID:	Laminate Press 10
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P049</b>
Company Equipment ID:	Laminate Press 12
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P050</b>
Company Equipment ID:	Laminate Press 15
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P053</b>
Company Equipment ID:	Laminate Press 18
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable

**Group Name: Pultrusion Press -Group 1**

<b>Emissions Unit ID:</b>	<b>P039</b>
Company Equipment ID:	Pultrusion Line 42
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P040</b>
Company Equipment ID:	Pultrusion Line 43
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable

**Group Name: Pultrusion Press Group 2**

<b>Emissions Unit ID:</b>	<b>P028</b>
Company Equipment ID:	Pultrusion Line 28
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P033</b>
Company Equipment ID:	Pultrusion Line 29
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P034</b>
Company Equipment ID:	Pultrusion Line 30
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable

**Group Name: Pultrusion Press Group 3**

<b>Emissions Unit ID:</b>	<b>P026</b>
Company Equipment ID:	Pultrusion Line 1
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P027</b>
Company Equipment ID:	Pultrusion Line 3
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable



<b>Emissions Unit ID:</b>	<b>P029</b>
Company Equipment ID:	Pultrusion Line 7
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P030</b>
Company Equipment ID:	Pultrusion Line 8
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P032</b>
Company Equipment ID:	Pultrusion Line 12
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable

**Group Name: Pultrusion Press Group 4**

<b>Emissions Unit ID:</b>	<b>P023</b>
Company Equipment ID:	Pultrusion Line 44
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P037</b>
Company Equipment ID:	Pultrusion Line 40
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable

**Group Name: Pultrusion Press Group 5**

<b>Emissions Unit ID:</b>	<b>P035</b>
Company Equipment ID:	Pultrusion Line 31
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P036</b>
Company Equipment ID:	Pultrusion Line 32
Superseded Permit Number:	13-03893
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install**  
RochlingGlastic Composites  
**Permit Number:** P0110227  
**Facility ID:** 1318544510  
**Effective Date:** 11/7/2012

## **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 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 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, and reporting requirements 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 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.



**Final Permit-to-Install**  
RochlingGlastic Composites  
**Permit Number:** P0110227  
**Facility ID:** 1318544510  
**Effective Date:** 11/7/2012

## **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) g)(1)
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 and 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
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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 reporting requirements under 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5905(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 permittee shall comply with the applicable compliance requirements under 40 CFR, Part 63, Subpart WWWW, including the following sections:

63.5900	Demonstration of continuous compliance
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g) Miscellaneous Requirements

- (1) Air toxics modeling was previously done for PTI 13-03893 issued on 11/16/2004. However, because this facility is subject to MACT Subpart WWWW which limits the air toxic pollutants of concern, the air toxics terms and conditions have been removed in accordance with Ohio Revised Code 3704.03(F)(4)(e).



**Final Permit-to-Install**  
RochlingGlastic Composites  
**Permit Number:** P0110227  
**Facility ID:** 1318544510  
**Effective Date:** 11/7/2012

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



**1. L002, Parts washer - Cold Room**

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

Fully enclosed, automated parts washer that utilizes a monomer mixture to wash tubes, parts and filters.

- 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.

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) (PTI 13-03893, issued 11/16/2004)	<p>Volatile organic compound (VOC) emissions shall not exceed 47.90 lbs/day (stack emissions).</p> <p>VOC emissions shall not exceed 8.74 tons/year (stack emissions).</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(O)(2) and 40 CFR Part 63 Subpart WWWW.</p> <p>See b)(2)a. through b)(2)c. below.</p>
b.	OAC rule 3745-21-09(O)(2)	See b)(2)c. and c)(1) below.
d.	40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780-5935)	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 parts washer is not built as conventional cold cleaning equipment, therefore, some requirements in the OAC rule 3745-21-09(O)(2) are not applicable to this emissions unit.



This emissions unit does not employ halogenated solvents. Therefore, this emissions unit is not subject to the applicable provisions of 40 CFR Part 63, Subpart T.

- b. The cold cleaner shall be equipped with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute (psia), measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during drainage, unless an internal type drainage device cannot fit into the cleaning system.

c) Operational Restrictions

- (1) The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
  - a. provide a permanent, legible, conspicuous label, summarizing the operating requirements;
  - b. store waste solvent in covered containers;
  - c. close the cover whenever parts are not being handled in the cleaner;
  - d. drain the cleaned parts until the dripping ceases; and
  - e. clean only materials that are neither porous nor absorbent.

[Authority for term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
  - a. the total number of washes performed/day; and
  - b. the VOC emissions, in lbs, as calculated using the following equation:

VOC emissions = (1.10 lbs of VOC emissions/wash\*) x (d)(1)a., the total number of washes/day)

\* The emission factor of 1.1, lbs of VOC emissions/wash was developed by the permittee. Should a more accurate emission factor be developed in the future, the permittee shall use it, provided the emission factor is mutually agreeable between the Ohio EPA, through the Cleveland DAQ and Glastic Corporation South Euclid Facility.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall maintain the following records in written or electronic form.
  - a. the types of solvents employed in the cold cleaner; and



- b. the vapor pressure of each solvent, in pounds per square in absolute (psia), measured at 100 degrees Fahrenheit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include an identification of the following:

- a. all exceedances of the daily VOC emission limitation, and a record of what the actual VOC emissions were for each such day; and
- b. all exceedances of the allowable vapor pressure for the solvent.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit annual reports to the Cleveland Division of Air Quality that specify the total VOC emissions from this unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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:

47.90 lbs of VOC emissions/day (stack emissions)

Applicable Compliance Method:

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

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

[Authority for term: OAC rule 3745-77-07(C)(1)]



b. Emission Limitation:

8.74 tons of VOC emissions/year (stack emissions)

Applicable Compliance Method:

The annual VOC emission limitation was established by multiplying the daily VOC emission limitation (47.9 lbs of VOC emissions/day) by 365 days/year, and dividing by 2,000 lbs/ton. Therefore compliance with the annual VOC emission limitation is ensured while compliance is maintained with the daily VOC emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



**2. P014, Morehouse Mixer**

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

Morehouse mixer contains two mix kettles with 78 cubic feet of volume that provide resin mixes for use in laminates. Emissions unit controlled by the 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.	OAC rule 3745-31-05(A)(3) PTI 13-03893 issued on 11/16/2004	Organic Compound (OC) emissions shall not exceed 1.67 lbs/hr, including cleanup material (stack emissions).  OC emissions shall not exceed 39.99 lbs/day, including OC emissions from the use of cleanup material (stack emissions).  OC emissions shall not exceed 7.3 tons/year, including OC emissions from the use of cleanup material (stack emissions).  Particulate emissions (PE) shall not exceed 0.071 lb/hr (stack emissions).  PE shall not exceed 0.01 grain/dscf (stack emissions).  PE shall not exceed 0.31 TPY from the dust collector stack.  There shall be no visible PE from the dust collector stack. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-07(A)(1)	The visible PE limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)
d.	OAC rule 3745-21-25	The requirements of this rule are equivalent to the MACT requirements in 40 CFR Part 63, Subpart WWWW.
e.	40 CFR part 63, Subpart WWWW (40 CFR Part 63.5780-5935)	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 this unit shall be vented to the central dust collector that controls the particulate emissions from all of the emissions units at this facility.
- b. The liquid organic material in the mix operations include styrene and methyl methacrylate which are photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5). All of the OC emissions from this emissions unit count toward the hourly limit including the OC emissions from any non-photochemically reactive materials used in the mix operations.
- c. The OC emission factors used to calculate the OC 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 Environmental Protection Agency (Ohio EPA), through the Cleveland DAQ, and Glastic Corporation of South Euclid Facility.
- d. In accordance with paragraph (A)(3) of OAC rule 3745-21-25, upon achieving compliance with this rule, the reinforced plastic composite production operations at this facility are not required to meet the February 18, 2008 revision of OAC rule 3745-21-07.



c) Operational Restrictions

- (1) The permittee shall operate the dust collector whenever dry filler is being added to this emissions unit. The permittee shall maintain the dust collector filter 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.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (2) The permittee shall keep containers that store HAP containing resin 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.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart WWWW Table 4].

- (3) The permittee shall use a closed feed system to charge non-liquid material and shall use covers over the mixing kettles.

[Authority for term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
  - a. the company identification for each liquid resin mix manufactured, and each photochemically reactive cleanup material employed;
  - b. the OC concentration of each liquid resin mix manufactured, in lbs/cu ft;
  - c. the OC concentration of each cleaning monomer employed, in lbs/cubic ft;
  - d. the number of cleaning cycles conducted;
  - e. the total number of batches of liquid resin mix manufactured;
  - f. the total hours of operation;
  - g. the total OC emissions for all resin batches, in lbs [(e) x (b) x (mixer volume, 78 cubic ft/batch) x (2 volume changes)];
  - h. the total OC emissions from all cleanup materials employed, in lbs [(c) x (d) x (mixer volume, 78 cubic ft/batch) x (2 volume changes)];



- i. the total OC emissions from all resin batches and cleanup materials, in lbs [(g) + (h)]; and
- j. the average hourly OC emission rate, in lbs/hr (i/f).

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall perform weekly checks, when the emissions unit is 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 emissions incident; and
- e. any corrective actions taken to eliminate the visible emissions.

If the weekly checks show visible emissions that are representative of normal operations 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall maintain daily records that document any time period when the dust collector was not in service when this emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the hourly OC emission limitations, and what the calculated hourly OC emissions were for each exceedance.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]



- (3) The permittee shall submit annual reports to the Cleveland Division of Air Quality that specify the total OC emissions from this emission unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall notify Cleveland DAQ in writing of any daily record showing that the dust collector was not in operation 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall submit semi-annual written reports that (a) identify all days during which any visible PE was 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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:

1.67 lbs/hr of OC emissions, including cleanup material (stack emissions).

Applicable Compliance Method:

The OC emission limitation was established by the use of emission factors developed by the permittee and the calculation method outlined in d)(1).

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



The permittee shall demonstrate compliance with the OC emission limitation based upon the results of emission testing conducted in accordance with Methods 1-4, 18, and 25 of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

39.99 lbs of OC emissions/day, including OC emissions from the use of cleanup material (stack emissions).

Applicable Compliance Method:

Compliance with the daily OC emission limitation shall be determined by the recordkeeping requirements specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

7.30 tons of OC emissions/yr, including photochemically reactive cleanup material (stack emissions).

Applicable Compliance Method:

The annual OC emission limitation was established by multiplying the daily OC emission limitation from the pultrusion line by 365 days/year and dividing by 2,000 lbs/ton. Therefore, compliance with the annual OC emission limitation is ensured while compliance is maintained with the daily OC emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

There shall be no visible PE from the dust collector stack serving this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined through visible PE observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 and the procedures specified in OAC rule 3745-17-03(B)(1).

e. Emission Limitation:

0.071 lb of PE/hr; 0.01 grain/dscf



Applicable Compliance Method:

The hourly emission limitation was established by the following methodology:

$$HER = (DCFR) \times (DCEF) \times (TI) \times (CONV) = PE/hr$$

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 necessary, compliance shall be demonstrated through emission testing conducted in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

f. Emission Limitation:

0.31 ton of PE/yr

Applicable Compliance Method:

The annual PE limitation was established by multiplying the hourly PE limitation by the maximum operating schedule of 8,760-hours/year, and dividing by 2,000 lbs/ton. Therefore, compliance with the annual PE limitation is ensured while compliance with the hourly PE limitation is maintained.

g) Miscellaneous Requirements

(1) Potential to emit calculations:

particulate emissions:

controlled outlet emission rate from the dust collector:

$$(22,703 \text{ dscf/min}) \times (0.005 \text{ gr/dscf}) \times (60 \text{ min/hr}) \times (1 \text{ lb/7,000 gr}) = 0.97 \text{ lb PE/hr; and}$$

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The terms in this permit supersede those identified in PTI 13-2382 issued 4/29/1992, PTI 13-2752 issued 11/17/1993, and PTI 13-03893 issued on 11/16/2004.



**3. P038, Pultrusion Line 41**

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

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.	OAC rule 3745-31-05(A)(3) PTI 13-03893 issued on 11/16/2004	<p>Fugitive organic compound (OC) emissions shall not exceed 3.7 lbs/hr from the pultrusion line.</p> <p>Fugitive OC emissions shall not exceed 40 lbs/day from the pultrusion line.</p> <p>Fugitive OC emissions shall not exceed 7.3 tons/yr from the pultrusion line.</p> <p>Fugitive OC emissions shall not exceed 2.56 tons/yr from all cleanup material employed in P023, P026, P027, P028, P029, P030, P032, P033, P034, P035, P036, P037, P038, P039, P040, P065, P073, and P074 combined.</p> <p>Particulate emissions (PE) shall not exceed 0.354 lb/hr from emissions units P023, P037, P038, P039, and P040 combined (stack emissions).</p> <p>PE shall not exceed 1.550 tons/yr from emissions units P023, P037, P038, P039, and P040 combined (stack emissions).</p> <p>Visible PE shall not exceed 5% opacity, as a 6-minute average, from the dust collector stack.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW.
b.	OAC rule 3745-17-07(A)(1)	The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-21-25	The requirements of this rule are equivalent to the MACT requirements in 40 CFR Part 63, Subpart WWWW.
e.	40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780 – 5935)	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 this unit shall be vented to the central dust collector that controls the particulate emissions from all of the emissions units at this facility.
- b. The emission of organic material from the resin consists of styrene, a photochemically reactive material and hazardous air pollutant (HAP),
- c. The OC emission factors used to calculate the OC 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, through the Cleveland DAQ, and Glastic Corporation South Euclid Facility.
- d. In accordance with paragraph (A)(3) of OAC rule 3745-21-25, upon achieving compliance with this rule, the reinforced plastic composite production operations at this facility are not required to meet the February 18, 2008 revision of OAC rule 3745-21-07.



c) Operational Restrictions

- (1) The permittee shall operate the dust collector whenever this emissions unit is in operation. The permittee shall maintain the dust collector filter 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.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (2) The permittee shall keep containers that store HAP containing resin 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.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart WWWW Table 4].

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
  - a. the name and type of each pultrusion part;
  - b. the emission factor for each type of pultrusion part, in lbs of OC emissions/square foot of wet area/hr;
  - c. the wet area for each type of pultrusion part, in square feet;
  - d. the OC emissions for each type of pultrusion part, in lbs [(b) x (c)];
  - e. the total OC emissions from all pultrusion parts, in lbs [summation of (d) for all pultrusion parts made];
  - f. the total number of hours this emissions unit was in operation; and
  - g. the average hourly OC emission rate in lbs/hr (e/f); and

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall maintain monthly records of the following information for emissions units P023, P026, P027, P028, P029, P030, P032, P033, P034, P035, P036, P037, P038, P039, P040, P065, P073, and P074 combined:
  - 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 material from the volume of each dispensed cleanup material [(a) - (b)];
- d. the OC content of 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).

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (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 and divided by 2,000 lbs/ton].

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall perform weekly checks, when the emissions unit is 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 emissions incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

If the weekly checks show visible emissions that are representative of normal operations 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall maintain daily records that document any time period when the dust collector was not in service when this emissions unit was 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 and/or daily OC emission limitations for this emissions unit were exceeded, and what the hourly and daily OC emissions were for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit semiannual written reports that (a) identify all days during which any visible PE were observed from the stack serving this emissions unit 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall submit annual reports to the Cleveland Division of Air Quality that specify the total OC emissions (i.e., from all the pultrusion parts made by this emissions unit and from cleanup material employed from all pultrusion lines) for the previous calendar year, in tons. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall notify Cleveland DAQ in writing of any daily record showing that the dust collector was not in operation 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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. Emissions Limitation:

3.7 lbs of OC emissions/hr, from the pultrusion line (fugitive emissions).

Applicable Compliance Method:

The OC 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 OC emission limitation shall be determined by the record keeping requirements specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emissions Limitation:

40 lbs of OC emissions/day, from the pultrusion line (fugitive emissions).

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emissions Limitation:

7.3 tons of OC emissions/yr, from the pultrusion line (fugitive emissions).

Applicable Compliance Method:

The annual OC emission limitation was established by multiplying the daily OC emission limitation from the pultrusion line by 365 days/year, and dividing by 2,000 lbs/ton. Therefore compliance with the annual OC emission limitation is assumed while compliance is maintained with the daily OC emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

2.56 tons of OC emissions/yr, from all cleanup material employed for emissions units P023, P026, P027, P028, P029, P030, P032, P033, P034, P035, P036, P037, P038, P039, P040, P065, P073, and P074 combined (fugitive emissions).

Applicable Compliance Method:

Compliance with the annual OC emission limitation shall be determined by the record keeping requirements specified in d)(2) and d)(3).

[Authority for term: OAC rule 3745-77-07(C)(1)]



e. Emission Limitation:

Visible PE shall not exceed 5% opacity, as a 6-minute average, from the dust collector stack.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

f. Emission Limitation:

0.354 lb of PE/hr, from emissions units P023, P037, P038, P039, and P040 combined (stack emissions).

Applicable Compliance Method:

The hourly PE limitation was established by the following methodology:

$$\text{HER} = (\text{DCFR}) \times (\text{DCEF}) \times (\text{TI}) \times (\text{CONV}) = \text{lb PE/hr}$$

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, as appropriate.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g. Emission Limitation:

1.550 tons of PE/yr, from emissions units P023, P037, P038, P039, and P040 combined (stack emissions).



Applicable Compliance Methods:

The annual PE limitation was established by multiplying the hourly PE limitation by the maximum operating schedule of 8,760 hrs/year, and dividing by 2,000 lbs/ton. Therefore, compliance with the annual PE limitation is ensured while compliance with the hourly PE limitation is maintained.

g) Miscellaneous Requirements

(1) Potential to emit calculations:

particulate emissions:

controlled outlet emission rate from the dust collector:

$(22,703 \text{ dscf/min}) \times (0.005 \text{ gr/dscf}) \times (60 \text{ min/hr}) \times (1 \text{ lb}/7,000 \text{ gr}) = 0.97 \text{ lb PE/hr}$ ; and

$(0.97 \text{ lb PE/hr}) \times (8,760 \text{ hrs/yr}) \times (1 \text{ ton}/2,000 \text{ lbs}) = 4.25 \text{ TPY of PE}$  (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).

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The terms in this permit supersede those identified in PTI 13-2382 issued 4/29/1992, PTI 13-2752 issued 11/17/1993, and PTI 13-03893 issued on 11/16/2004.



**4. P051, Laminate Press 16**

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

Laminate press with manual resin spreader.

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) PTI 13 – 03893 issued 11/16/2004	Fugitive organic compound (OC) emissions shall not exceed 1.5 lbs/hr from the laminate press.  Fugitive OC emissions shall not exceed 6.57 tons /year, from the laminate press.  Fugitive OC emissions shall not exceed 0.324 ton/yr from all cleanup material employed for emission units P042, P047, P049, P050, P051, P053, P059, and P060 combined.  The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW.
b.	OAC rule 3745-21-25	The requirements of this rule are equivalent to the MACT requirements in 40 CFR Part 63, Subpart WWWW.
c.	40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780 – 5935)	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 OC emission factors used to calculate the OC emissions 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, through the Cleveland DAQ, and Glastic Corporation South Euclid facility.
- b. In accordance with paragraph (A)(3) of OAC rule 3745-21-25, upon achieving compliance with this rule, the reinforced plastic composite production operations at this facility are not required to meet the February 18, 2008 revision of OAC rule 3745-21-07.

c) Operational Restrictions

- (1) The permittee shall keep containers that store HAP containing resin 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.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart WWWW Table 4].

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
  - a. the company identification of each liquid resin mix received for processing;
  - b. company identification of the OC emission factor (EF) for each liquid resin mix processed;
  - c. the total hours of operation;
  - d. the total OC emissions from all liquid resin mixes employed in lbs [summation of (EF, in lbs of OC emissions/hr) x (c) for each liquid resin mix]; and
  - e. the average hourly OC emission rate, in lbs (d/c).

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall maintain monthly records of the following information for emission units P042, P047, P049, P050, P051, P052, P053, P059, and P060 combined:
  - 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 material from the volume of each dispensed cleanup material [(a) – (b)];



- d. the OC content of 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].

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (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 and divided by 2,000 lbs/ton].

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit annual reports to the Cleveland Division of Air Quality that specify the total OC emissions (i.e., from both the laminate product and from all cleanup material employed) from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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:

1.5 lbs of OC emissions/hr, from the laminate press (fugitive emissions).

Applicable Compliance Method:

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



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

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

6.57 tons of OC emissions/yr, for the laminate press (fugitive emissions)

Applicable Compliance Method:

The annual OC emission limitation was established by multiplying the hourly OC emission limitation by 8,760 hrs/yr, and dividing by 2,000 lbs/ton.

Compliance with the annual OC emission limitation is assumed while compliance is maintained with the hourly OC emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

0.324 ton of OC emissions/yr, from all cleanup material employed for emission units P042, P047, P049, P050, P051, P053, P059, and P060 combined (fugitive emissions).

Applicable Compliance Method:

Compliance with the annual OC emission limitation shall be determined by the record keeping requirements specified in d)(3).

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



**5. P059, Laminate Press 48**

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

Laminate press with manual resin spreader.

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) (PTI 13-03893 issued 11/16/2004)	Fugitive organic compound (OC) emissions shall not exceed 2.0 lbs/hr from the laminate press.  Fugitive OC emissions shall not exceed 40.0 lbs/day, from the laminate press.  Fugitive OC emissions shall not exceed 7.30 tons/yr, from the laminate press.  Fugitive OC emissions shall not exceed 0.324 ton /year, from all cleanup material employed for emission units P042, P047, P049, P050, P051, P053, P059, and P060 combined.  The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW.
b.	OAC rule 3745-21-25	The requirements of this rule are equivalent to the MACT requirements in 40 CFR 63, Subpart WWWW.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780 – 5935)	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 OC emission factors used to calculate the OC 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, through the Cleveland DAQ, and Glastic Corporation South Euclid Facility.
- b. In accordance with paragraph (A)(3) of OAC rule 3745-21-25, upon achieving compliance with this rule, the reinforced plastic composite production operations at this facility are not required to meet the February 18, 2008 revision of OAC rule 3745-21-07.

c) Operational Restrictions

- (1) The permittee shall keep containers that store HAP containing resin 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.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart WWWW Table 4].

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
  - a. the company identification of each liquid resin mix received for processing;
  - b. company identification of the OC emission factor (EF) for each liquid resin mix processed;
  - c. the total hours of operation;
  - d. the total OC emissions from all liquid resin mixes employed in lbs [summation of (EF, in lbs of OC emissions/hr) x (c) for each liquid resin mix]; and

the average hourly OC emission rate, in lbs (d/c). [Authority for term: OAC rule 3745-77-07(C)(1)]



- (2) The permittee shall maintain monthly records of the following information for emission units P042, P047, P049, P050, P051, P052, P053, P059, and P060 combined:
  - 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 material from the volume of each dispensed cleanup material [(a) – (b)];
  - d. the OC content of 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].

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (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 and divided by 2,000 lbs/ton].

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the hourly and/or daily OC emission limitation for this emissions unit was exceeded, and what the hourly and daily OC emissions were for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit annual reports to the Cleveland Division of Air Quality that specify the total OC emissions (i.e., from both the laminate product and from all cleanup material employed) from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]



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:

2.0 lbs of OC emissions/hr, from the laminate press (fugitive emissions).

Applicable Compliance Method:

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

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

40 lbs of OC emissions/day, from the laminate press (fugitive emissions).

Applicable Compliance Method:

Compliance with the daily OC emission limitation shall be determined by the recordkeeping requirements specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

7.3 tons of OC emissions/yr, for the laminate press (fugitive emissions)

Applicable Compliance Method:

The annual OC emission limitation was established by multiplying the daily OC emission limitation by 365 days/yr, and dividing by 2,000 lbs/ton.

Compliance with the annual OC emission limitation is assumed while compliance is maintained with the daily OC emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

0.324 ton of OC emissions/yr, from all cleanup material employed for emission units P042, P047, P049, P050, P051, P053, P059, and P060 combined (fugitive emissions).



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Applicable Compliance Method:

Compliance with the annual OC emission limitation shall be determined by the record keeping requirements specified in d)(3).

[Authority for term: OAC rule 3745-77-07(C)(1)]

- g) Miscellaneous Requirements
  - (1) None.



**6. P060, Laminate Press 49**

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

Laminate press with manual resin spreader.

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) (PTI 13-03893 issued 11/16/2004)	Fugitive organic compound (OC) emissions shall not exceed 2.75 lbs/hr from the laminate press.  Fugitive OC emissions shall not exceed 40 lbs/day, from the laminate press.  Fugitive OC emissions shall not exceed 7.3 tons/yr, from the laminate press.  Fugitive OC emissions shall not exceed 0.324 ton/yr from all cleanup material employed for emission units P042, P047, P049, P050, P051, P053, P059, and P060 combined.  The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW.
b.	OAC rule 3745-21-25	The requirements of this rule are equivalent to the MACT requirements in 40 CFR Part 63, Subpart WWWW.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780 – 5935)	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 OC emission factors used to calculate the OC 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, through the Cleveland DAQ, and Glastic Corporation South Euclid Facility.
- b. In accordance with paragraph (A)(3) of OAC rule 3745-21-25, upon achieving compliance with this rule, the reinforced plastic composite production operations at this facility are not required to meet the February 18, 2008 revision of OAC rule 3745-21-07.

c) Operational Restrictions

- (1) The permittee shall keep containers that store HAP containing resin 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.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart WWWW Table 4].

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
  - a. the company identification of each liquid resin mix received for processing;
  - b. company identification of the OC emission factor (EF) for each liquid resin mix processed;
  - c. the total hours of operation;
  - d. the total OC emissions from all liquid resin mixes employed in lbs [summation of (EF, in lbs of OC emissions/hr) x (c) for each liquid resin mix]; and



e. the average hourly OC emission rate, in lbs (d/c).

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall maintain monthly records of the following information for emission units P042, P047, P049, P050, P051, P052, P053, P059, and P060 combined:

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 material from the volume of each dispensed cleanup material [(a) – (b)];

d. the OC content of 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].

[Authority for term: OAC rule 3745-77-07(C)(1)]

(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 and divided by 2,000 lbs/ton].

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the hourly and/or daily OC emission limitation for this emissions unit was exceeded, and what the hourly and daily OC emissions were for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 13-03893]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall submit annual reports to the Cleveland Division of Air Quality that specify the total OC emissions (i.e., from both the laminate product and from all cleanup material employed) from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]



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:

2.75 lbs of OC emissions/hr, from the laminate press (fugitive emissions).

Applicable Compliance Method:

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

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

40 lbs of OC emissions/day, from the laminate press (fugitive emissions).

Applicable Compliance Method:

Compliance with the daily OC emission limitation shall be determined by the recordkeeping requirements specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

7.3 tons of OC emissions/yr, for the laminate press (fugitive emissions).

Applicable Compliance Method:

The annual OC emission limitation was established by multiplying the daily OC emission limitation by 365 days/yr, and dividing by 2,000 lbs/ton.

Compliance with the annual OC emission limitation is assumed while compliance is maintained with the hourly OC emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

0.324 ton of OC emissions/yr, from all cleanup material employed for emission units P042, P047, P049, P050, P051, P053, P059, and P060 combined (fugitive emissions).



**Final Permit-to-Install**  
RochlingGlastic Composites  
**Permit Number:** P0110227  
**Facility ID:** 1318544510  
**Effective Date:** 11/7/2012

Applicable Compliance Method:

Compliance with the annual OC emission limitation shall be determined by the record keeping requirements specified in d)(3).

[Authority for term: OAC rule 3745-77-07(C)(1)]

- g) Miscellaneous Requirements
  - (1) None.



**7. P063, Tote Filling - Cold Room**

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

Cold room tote filling station.

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) (PTI 13-03893, issued 11/16/2004)	Fugitive emissions of organic compounds (OC) shall not exceed 1.0 lb /hr (. Fugitive OC emissions shall not exceed 4.38 tons /yr. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW.
b.	OAC rule 3745-21-25	The requirements of this rule are equivalent to the MACT requirements in 40 CFR Part 63, Subpart WWWW.
c.	40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780 – 5935)	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. None.



c) Operational Restrictions

- (1) The permittee shall keep containers that store HAP containing resin 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.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart WWWW Table 4].

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain and record the following information for each day when this emissions unit is in operation:

- a. the types of liquid resin mixes employed in the tote filling;
- b. the OC content of each liquid resin mix, in lbs of OC emissions/tote filled\*;
- c. the total number of totes filled;
- d. the total number of hours this emissions unit was in operation;
- e. the total OC emissions, in lbs [summation of (b) x (c) for each tote filled]; and
- f. the average hourly OC emission rate, in lbs [e/d].

\* An initial OC emission factor of 0.21 lb of OC emissions/tote filled was established by the permittee. Should a more accurate emission factor be developed in the future, the permittee shall use it provided the emission factor is mutually agreeable between the Ohio EPA, through the Cleveland DAQ, and Glastic Corporation South Euclid Facility.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the hourly OC emission limitation for this unit was exceeded, and that the hourly OC emissions were for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]



- (3) The permittee shall submit annual reports to the Cleveland DAQ that specify the total OC emissions, in tons, from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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:

1.0 lb of OC emissions/hr.

Applicable Compliance Method:

The hourly OC emission limitation was established by the following methodology:

hourly OC emissions = (0.21 lb of OC emissions/tote filled\*) x (totes filled/day) x (1 day/hours of operation)

\* The OC emission factor was established by the permittee. Should a more accurate emission factor be developed in the future, the permittee shall use it provided the emission factor is mutually agreeable between the Ohio EPA, the Cleveland DAQ, and Glastic Corporation South Euclid Facility.

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

4.38 tons of OC emissions/year.

Applicable Compliance Method:

The annual OC emission limitation was established by multiplying the hourly OC emission limitation by 8,760-hours/year, and dividing by 2,000 pounds/ton. Therefore, compliance with the annual OC emission limitation is assumed while compliance with the hourly OC emissions limitation is maintained.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



**8. Emissions Unit Group -Laminate Presses: P042, P047, P049, P050, P053.**

EU ID	Operations, Property and/or Equipment Description
P042	Laminate press with manual resin spreader.
P047	Laminate press with manual resin spreader.
P049	Laminate press with manual resin spreader.
P050	Laminate press with manual resin spreader.
P053	Laminate press with manual resin spreader.

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) (PTI 13-03893, issued 11/16/2004)	Fugitive organic compound (OC) emissions shall not exceed 1.0 lbs/hr from the laminate press.  Fugitive OC emissions shall not exceed 4.38 tons /year, from the laminate press.  Fugitive OC emissions shall not exceed 0.324 ton/yr from all cleanup material employed for emission units P042, P047, P049, P050, P051, P053, P059, and P060 combined.  The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW.
b.	OAC rule 3745-21-25	The requirements of this rule are equivalent to the MACT requirements in 40 CFR Part 63, Subpart WWWW.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	40 CFR Part 63, Subpart WWWW (40 CFR Part 63.5780 – 5935)	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 OC emission factors used to calculate the OC emissions 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, through the Cleveland DAQ, and Glastic Corporation South Euclid facility.
- b. In accordance with paragraph (A)(3) of OAC rule 3745-21-25, upon achieving compliance with this rule, the reinforced plastic composite production operations at this facility are not required to meet the February 18, 2008 revision of OAC rule 3745-21-07.

c) Operational Restrictions

- (1) The permittee shall keep containers that store HAP containing resin 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.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart WWWW Table 4].

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain and record the following information for each day when this emissions unit is in operation:
  - a. the company identification of each liquid resin mix received for processing;
  - b. company identification of the OC emission factor (EF) for each liquid resin mix processed;
  - c. the total hours of operation;
  - d. the total OC emissions from all liquid resin mixes employed in lbs [summation of (EF, in lbs of OC emissions/hr) x (c) for each liquid resin mix]; and
  - e. the average hourly OC emission rate, in lbs (d/c).

[Authority for term: OAC rule 3745-77-07(C)(1)]



- (2) The permittee shall maintain monthly records of the following information for emission units P042, P047, P049, P050, P051, P052, P053, P059, and P060 combined:
  - 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 material from the volume of each dispensed cleanup material [(a) – (b)];
  - d. the OC content of 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].

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (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) for all months of the calendar year and divided by 2,000 lbs/ton].

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit annual reports to the Cleveland Division of Air Quality that specify the total OC emissions (i.e., from both the laminate product and from all cleanup material employed) from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]



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:

1.0 lbs of OC emissions/hr, from the laminate press (fugitive emissions).

Applicable Compliance Method:

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

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

4.38 tons of OC emissions/yr, for the laminate press (fugitive emissions).

Applicable Compliance Method:

The annual OC emission limitation was established by multiplying the hourly OC emission limitation by 8,760 hrs/yr, and dividing by 2,000 lbs/ton.

Compliance with the annual OC emission limitation is assumed while compliance is maintained with the hourly OC emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

0.324 ton of OC emissions/yr, from all cleanup material employed for emission units P042, P047, P049, P050, P051, P053, P059, and P060 combined (fugitive emissions).

Applicable Compliance Method:

Compliance with the annual OC emission limitation shall be determined by the record keeping requirements specified in d)(3).

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



**9. Emissions Unit Group -Pultrusion Press -Group 1: P039, P040.**

EU ID	Operations, Property and/or Equipment Description
P039	Pultrusion press with a bath section, heated die and curing section, and a cut-off saw. Line used to produce fuse tubes, channels, doors, and rods. Emissions unit controlled by a central dust collector.
P040	Pultrusion press with a bath section, heated die and curing section, and a cut-off saw. Emissions 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.	OAC rule 3745-31-05(A)(3) PTI 13-03893 issued on 11/16/2004	<p>Fugitive organic compound (OC) emissions shall not exceed 2.0 lbs/hr from each pultrusion line.</p> <p>Fugitive OC emissions shall not exceed 40 lbs/day from each pultrusion line.</p> <p>Fugitive OC emissions shall not exceed 7.3 tons/yr from each pultrusion line.</p> <p>Fugitive OC emissions shall not exceed 2.56 tons/yr from all cleanup material employed in P023, P026, P027, P028, P029, P030, P032, P033, P034, P035, P036, P037, P038, P039, P040, P065, P073, and P074 combined.</p> <p>Particulate emissions (PE) shall not exceed 0.354 lb (PE)/hr from emissions units P023, P037, P038, P039, and P040 combined (stack emissions).</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>PE shall not exceed 1.550 tons of PE/yr from emissions units P023, P037, P038, P039, and P040 combined (stack emissions).</p> <p>Visible PE shall not exceed 5% opacity, as a 6-minute average, from the dust collector stack.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW.</p>
b.	OAC rule 3745-17-07(A)(1)	The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-21-25	The requirements of this rule are equivalent to the MAC requirements in 40 CFR Part 63, Subpart WWWW.
e.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 - 5935)	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 above 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 emission of organic material from the resin consists of styrene, a photochemically reactive material and hazardous air pollutant (HAP).
- c. The OC emission factors used to calculate the OC 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, through the Cleveland DAQ, and Glastic Corporation South Euclid Facility.

- d. In accordance with paragraph (A)(3) of OAC rule 3745-21-25, upon achieving compliance with this rule, the reinforced plastic composite production operations at this facility are not required to meet the February 18, 2008 revision of OAC rule 3745-21-07.

c) **Operational Restrictions**

- (1) The permittee shall operate the dust collector whenever the above emission units are in operation. The permittee shall maintain the dust collector filter 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.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (2) The permittee shall keep containers that store HAP containing resin 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.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart WWWW, Table 4]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain and record the following information for each day when the above identified emissions units are in operation:
  - a. the name and type of each pultrusion part;
  - b. the emission factor for each type of pultrusion part, in lbs of OC emissions/square foot of wet area/hr;
  - c. the wet area for each type of pultrusion part, in square feet;
  - d. the OC emissions for each type of pultrusion part, in lbs [(b) x (c)];
  - e. the total OC 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 OC emission rate in lbs/hr (e/f).



[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall maintain monthly records of the following information for emissions units P023, P026, P027, P028, P029, P030, P032, P033, P034, P035, P036, P037, P038, P039, P040, P065, P073, and P074 combined:
- 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 material from the volume of each dispensed cleanup material [(a) - (b)];
  - d. the OC content of 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].

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (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 and divided by 2,000 lbs/ton].

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall perform weekly checks, when the emission units are in operation and when the weather conditions allow, for any visible PE from the stack serving the emission units. 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 emissions incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

If the weekly checks show visible emissions that are representative of normal operations 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]



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

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit semiannual written reports that (a) identify all days during which any visible PE were observed from the dust collector stack (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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall submit annual reports to the Cleveland Division of Air Quality that specify the total OC emissions (i.e., from all the pultrusion parts made on each pultrusion line and from cleanup material employed from all pultrusion lines) for the previous calendar year, in tons. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall notify Cleveland DAQ in writing for 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (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 webportal.

[Authority for term: OAC rule 3745-77-07(C)(1)]



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. Emissions Limitation:

2.0 lbs of OC emissions/hr, from each pultrusion line (fugitive emissions).

Applicable Compliance Method:

The OC 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 OC emission limitation shall be determined by the record keeping requirements specified in Section d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emissions Limitation:

40 lbs of OC emissions/day, from each pultrusion line (fugitive emissions).

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emissions Limitation:

7.3 tons of OC emissions/yr, from each pultrusion line (fugitive emissions).

Applicable Compliance Method:

The annual OC emission limitation was established by multiplying the daily OC emission limitation from the pultrusion line by 365 days/year, and dividing by 2,000 lbs/ton. Therefore compliance with the annual OC emission limitation is assumed while compliance is maintained with the daily OC emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

2.56 tons of OC emissions/yr, from all cleanup material employed for emissions units P023, P026, P027, P028, P029, P030, P032, P033, P034, P035, P036, P037, P038, P039, P040, P065, P073, and P074 combined (fugitive emissions).



Applicable Compliance Method:

Compliance with the annual OC emission limitation shall be determined by the record keeping requirements specified in d)(2) and d)(3).

[Authority for term: OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

Visible PE shall not exceed 5% opacity, as a 6-minute average, from the dust collector stack.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

f. Emission Limitation:

0.354 lb of PE/hr, from emissions units P023, P037, P038, P039, and P040 combined (stack emissions).

Applicable Compliance Method:

The hourly PE limitation was established by the following methodology:

$$\text{HER} = (\text{DCFR}) \times (\text{DCEF}) \times (\text{TI}) \times (\text{CONV}) = \text{lb PE/hr}$$

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, as appropriate.

[Authority for term: OAC rule 3745-77-07(C)(1)]



g. Emission Limitation:

1.550 tons of PE/yr, from emissions units P023, P037, P038, P039, and P040 combined (stack emissions).

Applicable Compliance Methods:

The annual PE limitation was established by multiplying the hourly PE limitation by the maximum operating schedule of 8,760 hrs/year, and dividing by 2,000 lbs/ton. Therefore, compliance with the annual PE limitation is ensured while compliance with the hourly PE limitation is maintained.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) Potential to emit calculations:

particulate emissions:

Controlled outlet emission rate from dust collector:

$(22,703 \text{ dscf/min}) \times (0.005 \text{ gr/dscf}) \times (60 \text{ min/hr}) \times (1 \text{ lb}/7,000 \text{ gr}) = 0.97 \text{ lb PE/hr}; \text{ and}$

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The terms in this permit supersede those identified in PTI 13-2382 issued 4/29/1992, PTI 13-2752 issued 11/17/1993, and PTI 13-03893 issued on 11/16/2004.



**10. Emissions Unit Group -Pultrusion Press Group 2: P028, P033, P034,**

EU ID	Operations, Property and/or Equipment Description
P028	Pultrusion press with a bath section, heated die and curing section, and a cut-off saw. Emissions unit controlled by a central dust collector.
P033	Pultrusion press with a bath section, heated die and curing section, and a cut-off saw. Emissions unit controlled by a central dust collector.
P034	Pultrusion press with a bath section, heated die and curing section, and a cut-off saw. Emissions unit controlled by 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.	OAC rule 3745-31-05(A)(3) PTI 13-03893 issued on 11/16/2004	Fugitive organic compound (OC) emissions shall not exceed 2.50 lbs/hr from each pultrusion line.  Fugitive OC emissions shall not exceed 40 lbs/day from each pultrusion line.  Fugitive OC emissions shall not exceed 7.3 tons/yr from each pultrusion line.  Fugitive OC emissions shall not exceed 2.56 tons/yr from all cleanup material employed in P023, P026, P027, P028, P029, P030, P032, P033, P034, P035, P036, P037, P038, P039, P040, P065, P073, and P074 combined.  Particulate emissions (PE) shall not exceed 0.475 lb/hr from emissions units P028, P033, P034, P035, and P036 combined (stack emissions).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		PE shall not exceed 2.082 tons/yr from emissions units P028, P033, P034, P035, and P036 combined (stack emissions).  Visible PE shall not exceed 5% opacity, as a 6-minute average, from the dust collector stack.  The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW.
b.	OAC rule 3745-17-07(A)(1)	The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-21-25	The requirements of this rule are equivalent to the MACT requirements in 40 CFR Part 63, Subpart WWWW.
e.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	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 above emissions 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 emission of organic material from the resin consists of styrene, a photochemically reactive material and a hazardous air pollutant (HAP).
- c. The OC emission factors used to calculate the OC 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, through the Cleveland DAQ, and Glastic Corporation South Euclid Facility.

- d. In accordance with paragraph (A)(3) of OAC rule 3745-21-25, upon achieving compliance with this rule, the reinforced plastic composite production operations at this facility are not required to meet the February 18, 2008 revision of OAC rule 3745-21-07.

c) Operational Restrictions

- (1) The permittee shall operate the dust collector whenever the above identified emission units are in operation. The permittee shall maintain the dust collector filter 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 parameters.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (2) The permittee shall keep containers that store HAO containing resin 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.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart WWWW, Table 4]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain and record the following information for each day when the emissions units are in operation:
  - a. the name and type of each pultrusion part;
  - b. the emission factor for each type of pultrusion part, in lbs of OC emissions/square foot of wet area/hr;
  - c. the wet area for each type of pultrusion part, in square feet;
  - d. the OC emissions for each type of pultrusion part, in lbs [(b) x (c)];
  - e. the total OC 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 OC emission rate in lbs/hr (e/f).

[Authority for term: OAC rule 3745-77-07(C)(1)]



- (2) The permittee shall maintain monthly records of the following information for emissions units P023, P026, P027, P028, P029, P030, P032, P033, P034, P035, P036, P037, P038, P039, P040 and P065 combined:
- 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 material from the volume of each dispensed cleanup material [(a) - (b)];
  - d. the OC content of 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].

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (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 and divided by 2,000 lbs/ton].

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stack serving this emissions unit. 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 emissions incident; and
- e. any corrective actions taken to eliminate the visible emissions.

If the weekly checks show visible emissions that are representative of normal operations 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]



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

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the hourly and/or daily OC emission limitations for this emissions unit were exceeded, and what the hourly and daily OC emissions were for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit semiannual written reports that (a) identify all days during which any visible PE were observed from the stack serving this emissions unit 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall submit annual reports to the Cleveland Division of Air Quality that specify the total OC emissions (i.e., from all the pultrusion parts made on each pultrusion line and from cleanup material employed from all pultrusion lines) for the previous calendar year, in tons. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (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.

[Authority for term: OAC rule 3745-77-07(C)(1)]



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. Emissions Limitation:

2.50 lbs of OC emissions/hr, from each pultrusion line (fugitive emissions).

Applicable Compliance Method:

The OC 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 OC emission limitation shall be determined by the record keeping requirements specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emissions Limitation:

40 lbs of OC emissions/day, from each pultrusion line (fugitive emissions).

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emissions Limitation:

7.3 tons of OC emissions/yr, from each pultrusion line (fugitive emissions).

Applicable Compliance Method:

The annual OC emission limitation was established by multiplying the daily OC emission limitation from the pultrusion line by 365 days/year, and dividing by 2,000 lbs/ton. Therefore compliance with the annual OC emission limitation is assumed while compliance is maintained with the daily OC emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

2.56 tons of OC emissions/yr, from all cleanup material employed for emissions units P023, P026, P027, P028, P029, P030, P032, P033, P034, P035, P036, P037, P038, P039, P040, P065, P073, and P074 combined (fugitive emissions).



Applicable Compliance Method:

Compliance with the annual OC emission limitation shall be determined by the record keeping requirements specified in d)(2) and d)(3).

[Authority for term: OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

Visible PE shall not exceed 5% opacity, as a 6-minute average, from the dust collector stack.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

f. Emission Limitation:

0.475 lb of PE/hr, from emissions units P028, P033, P034, P035, and P036 combined (stack emissions).

Applicable Compliance Method:

The hourly PE limitation was established by the following methodology:

$$\text{HER} = (\text{DCFR}) \times (\text{DCEF}) \times (\text{TI}) \times (\text{CONV}) = \text{lb PE/hr}$$

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 5, as appropriate.

[Authority for term: OAC rule 3745-77-07(C)(1)]



g. Emission Limitation:

2.082 tons of PE/yr, from emissions units P028, P033, P034, P035, and P036 combined (stack emissions).

Applicable Compliance Methods:

The annual PE limitation was established by multiplying the hourly PE limitation by the maximum operating schedule of 8,760 hrs/year, and dividing by 2,000 lbs/ton. Therefore, compliance with the annual PE limitation is ensured while compliance with the hourly PE limitation is maintained.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) Potential to emit calculations:

particulate emissions:

Controlled outlet emission rate from dust collector:

$(22,703 \text{ dscf/min}) \times (0.005 \text{ gr/dscf}) \times (60 \text{ min/hr}) \times (1 \text{ lb}/7,000 \text{ gr}) = 0.97 \text{ lb PE/hr}$ ; and

$(0.97 \text{ lb PE/hr}) \times (8,760 \text{ hrs/yr}) \times (1 \text{ ton}/2,000 \text{ lbs}) = 4.25 \text{ TPY of PE}$  (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).

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The terms in this permit supersede those identified in PTI 13-2382 issued 4/29/1992, PTI 13-2752 issued 11/17/1993, and PTI 13-03893 issued on 11/16/2004.



**11. Emissions Unit Group -Pultrusion Press Group 3: P026, P027, P029, P030, P032**

EU ID	Operations, Property and/or Equipment Description
P026	Pultrusion press with a bath section, heated die and curing section, and a cut-off saw. Emissions unit controlled by a central dust collector.
P027	Pultrusion press with a bath section, heated die and curing section, and cut-off saw. Emissions unit controlled by a central dust collector.
P029	Pultrusion press with a bath section, heated die and curing section, and a cut-off saw. Emissions unit controlled by a central dust collector.
P030	Pultrusion press with a bath section, heated die and curing section, and a cut-off saw. Emissions unit controlled by a central dust collector.
P032	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.	OAC rule 3745-31-05(A)(3) PTI 13-03893 issued on 11/16/2004	Fugitive organic compound (OC) emissions shall not exceed 2.0 lbs/hr from each pultrusion line.  Fugitive OC emissions shall not exceed 40 lbs/day from each pultrusion line.  Fugitive OC emissions shall not exceed 7.3 tons/yr from each pultrusion line.  Fugitive OC emissions shall not exceed 2.56 tons/yr from all cleanup material employed in P023, P026, P027, P028, P029, P030, P032, P033, P034, P035, P036, P037, P038, P039, P040, P065, P073, and P074 combined.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Particulate emissions (PE) shall not exceed 0.268 lb/hr from emissions units P026, P027, P029, P030, and P032 combined (stack emissions).</p> <p>PE shall not exceed 1.174 tons/yr from emissions units P026, P027, P029, P030, and P032 combined (stack emissions).</p> <p>Visible PE shall not exceed 5% opacity, as a 6-minute average, from the dust collector stack.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW.</p>
b.	OAC rule 3745-17-07(A)(1)	The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-21-25	The requirements of this rule are equivalent to the MACT requirements in 40 CFR Part 63, Subpart WWWW.
e.	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 above emission units shall be vented to the central dust collector that controls the particulate emissions from all emissions units at this facility.
- b. The emission of organic material from the resin consists of styrene, a photochemically reactive material and hazardous air pollutant (HAP).



- c. The OC emission factors used to calculate the OC 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, through the Cleveland DAQ, and Glastic Corporation South Euclid Facility.
- d. In accordance with paragraph (A)(3) of OAC rule 3745-21-25, upon achieving compliance with this rule, the reinforced plastic composite production operations at this facility are not required to meet the February 18, 2008 revision of OAC rule 3745-21-07.

c) Operational Restrictions

- (1) The permittee shall operate the dust collector whenever this emissions unit is in operation. The permittee shall maintain the dust collector filter 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.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (2) The permittee shall keep containers that store HAP containing resin 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.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart WWWW, Table 4]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain and record the following information for each day when the emission units are in operation:
  - a. the name and type of each pultrusion part;
  - b. the emission factor for each type of pultrusion part, in lbs of OC emissions/square foot of wet area/hr;
  - c. the wet area for each type of pultrusion part, in square feet;
  - d. the OC emissions for each type of pultrusion part, in lbs [(b) x (c)];
  - e. the total OC 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 OC emission rate in lbs/hr (e/f).

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall maintain monthly records of the following information for emissions units P023, P026, P027, P028, P029, P030, P032, P033, P034, P035, P036, P037, P038, P039, P040, P065, P073, and P074 combined:

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 material from the volume of each dispensed cleanup material [(a) - (b)];

d. the OC content of 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].

[Authority for term: OAC rule 3745-77-07(C)(1)]

(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 and divided by 2,000 lbs/ton].

[Authority for term: OAC rule 3745-77-07(C)(1)]

(4) The permittee shall perform weekly checks, when the emissions unit is 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 emissions incident; and

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



If the weekly checks show visible emissions that are representative of normal operations 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the hourly and/or daily OC emission limitations for this emissions unit were exceeded, and what the hourly and daily OC emissions were for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit semiannual written reports that (a) identify all days during which any visible PE were observed from the stack serving this emissions unit 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall submit annual reports to the Cleveland Division of Air Quality that specify the total OC emissions (i.e., from all the pultrusion parts made on each pultrusion line and from cleanup material employed from all pultrusion lines) for the previous calendar year, in tons. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]



- (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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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. Emissions Limitation:

2.0 lbs of OC emissions/hr, from each pultrusion line (fugitive emissions).

Applicable Compliance Method:

The OC 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 OC emission limitation shall be determined by the record keeping requirements specified in Section d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emissions Limitation:

40 lbs of OC emissions/day, from each pultrusion line (fugitive emissions).

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emissions Limitation:

7.3 tons of OC emissions/yr, from each pultrusion line (fugitive emissions).

Applicable Compliance Method:

The annual OC emission limitation was established by multiplying the daily OC emission limitation from the pultrusion line by 365 days/year, and dividing by 2,000 lbs/ton. Therefore compliance with the annual OC emission limitation is assumed while compliance is maintained with the daily OC emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]



d. Emission Limitation:

2.56 tons of OC emissions/yr, from all cleanup material employed for emissions units P023, P026, P027, P028, P029, P030, P032, P033, P034, P035, P036, P037, P038, P039, P040, P065, P073, and P074 combined (fugitive emissions).

Applicable Compliance Method:

Compliance with the annual OC emission limitation shall be determined by the record keeping requirements specified in d)(2) and d(3).

[Authority for term: OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

Visible PE shall not exceed 5% opacity, as a 6-minute average, from the dust collector stack.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

f. Emission Limitation:

0.268 lb of PE/hr, from emissions units P026, P027, P029, P030, and P032 combined (stack emissions).

Applicable Compliance Method:

The hourly PE limitation was established by the following methodology:

$$\text{HER} = (\text{DCFR}) \times (\text{DCEF}) \times (\text{TI}) \times (\text{CONV}) = \text{lb PE/hr}$$

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, as appropriate.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g. Emission Limitation:

1.174 tons of PE/yr, from emissions units P026, P027, P029, P030, and P032 combined (stack emissions).

Applicable Compliance Methods:

The annual PE limitation was established by multiplying the hourly PE limitation by the maximum operating schedule of 8,760 hrs/year, and dividing by 2,000 lbs/ton. Therefore, compliance with the annual PE limitation is ensured while compliance with the hourly PE limitation is maintained.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) Potential to emit calculations:

particulate emissions:

Controlled outlet emission rate from dust collector:

$(22,703 \text{ dscf/min}) \times (0.005 \text{ gr/dscf}) \times (60 \text{ min/hr}) \times (1 \text{ lb}/7,000 \text{ gr}) = 0.97 \text{ lb PE/hr}$ ; and

$(0.97 \text{ lb PE/hr}) \times (8,760 \text{ hrs/yr}) \times (1 \text{ ton}/2,000 \text{ lbs}) = 4.25 \text{ TPY of PE}$  (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).

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The terms in this permit supersede those identified in PTI 13-2382 issued 4/29/1992, PTI 13-2752 issued 11/17/1993, and PTI 13-13-03893 issued on 11/16/2004.



**12. Emissions Unit Group -Pultrusion Press Group 4: P023, P037.**

EU ID	Operations, Property and/or Equipment Description
P023	Pultrusion press with a bath section, heated die and curing section, and a cut-off saw. Emissions unit controlled by a central dust collector.
P037	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.	OAC rule 3745-31-05(A)(3) PTI 13-03893 issued on 11/16/2004	Fugitive organic compound (OC) emissions shall not exceed 3.0 lbs/hr from each pultrusion line.  Fugitive OC emissions shall not exceed 40 lbs/day from each pultrusion line.  Fugitive OC emissions shall not exceed 7.3 tons/yr from each pultrusion line.  Fugitive OC emissions shall not exceed 2.56 tons/yr from all cleanup material employed in P023, P026, P027, P028, P029, P030, P032, P033, P034, P035, P036, P037, P038, P039, P040, P065, P073, and P074 combined.  Particulate emissions (PE) shall not exceed 0.354 lb/hr from emissions units P023, P037, P038, P039, and P040 combined (stack emissions).  PE shall not exceed 1.550 tons /yr from emissions units P023, P037, P038, P039, and P040 combined (stack emissions).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Visible PE shall not exceed 5% opacity, as a 6-minute average, from the dust collector stack.  The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW.
b.	OAC rule 3745-17-07(A)(1)	The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-21-25	The requirements of this rule are equivalent to the MACT requirements in 40 CFR Part 63, Subpart WWWW.
e.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	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 above emission units shall be vented to the central dust collector that controls the particulate emissions from all of the emission units at this facility.
- b. The emission of organic material from the resin consists of styrene, a photochemically reactive material and hazardous air pollutant (HAP).
- c. The OC emission factors used to calculate the OC 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, through the Cleveland DAQ, and Glastic Corporation South Euclid Facility.



- d. In accordance with paragraph (A)(3) of OAC rule 3745-21-25, upon achieving compliance with this rule, the reinforced plastic composite production operations at this facility are not required to meet the February 18, 2008 revision of OAC rule 3745-21-07.

c) Operational Restrictions

- (1) The permittee shall operate the dust collector whenever this emissions unit is in operation. The permittee shall maintain the dust collector filter 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.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (2) The permittee shall keep containers that store HAP containing resin 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.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart WWWW, Table 4]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain and record the following information for each day when the emission units are in operation:
  - a. the name and type of each pultrusion part;
  - b. the emission factor for each type of pultrusion part, in lbs of OC emissions/square foot of wet area/hr;
  - c. the wet area for each type of pultrusion part, in square feet;
  - d. the OC emissions for each type of pultrusion part, in lbs [(b) x (c)];
  - e. the total OC 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 OC emission rate in lbs/hr (e/f).

[Authority for term: OAC rule 3745-77-07(C)(1)]



- (2) The permittee shall maintain monthly records of the following information for emissions units P023, P026, P027, P028, P029, P030, P032, P033, P034, P035, P036, P037, P038, P039, P040, P065, P073, and P074 combined:
- 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 material from the volume of each dispensed cleanup material [(a) - (b)];
  - d. the OC content of 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].

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (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 and divided by 2,000 lbs/ton].

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall perform weekly checks, when the emissions unit is 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 emissions incident; and
- e. any corrective actions taken to eliminate the visible emissions.

If the weekly checks show visible emissions that are representative of normal operations 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]



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

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the hourly and/or daily OC emission limitations for this emissions unit were exceeded, and what the hourly and daily OC emissions were for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit semiannual written reports that (a) identify all days during which any visible PE were observed from the stack serving this emissions unit 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall submit annual reports to the Cleveland Division of Air Quality that specify the total OC emissions (i.e., from all the pultrusion parts made on each pultrusion line and from cleanup material employed from all pultrusion lines) for the previous calendar year, in tons. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (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.

[Authority for term: OAC rule 3745-77-07(C)(1)]



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. Emissions Limitation:

3.0 lbs of OC emissions/hr, from each pultrusion line (fugitive emissions).

Applicable Compliance Method:

The OC 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 OC emission limitation shall be determined by the record keeping requirements specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emissions Limitation:

40 lbs of OC emissions/day, from each pultrusion line (fugitive emissions).

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emissions Limitation:

7.3 tons of OC emissions/yr, from each pultrusion line (fugitive emissions).

Applicable Compliance Method:

The annual OC emission limitation was established by multiplying the daily OC emission limitation from the pultrusion line by 365 days/year, and dividing by 2,000 lbs/ton. Therefore compliance with the annual OC emission limitation is assumed while compliance is maintained with the daily OC emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

2.56 tons of OC emissions/yr, from all cleanup material employed for emissions units P023, P026, P027, P028, P029, P030, P032, P033, P034, P035, P036, P037, P038, P039, P040, P065, P073, and P074 combined (fugitive emissions).



Applicable Compliance Method:

Compliance with the annual OC emission limitation shall be determined by the record keeping requirements specified in d)(2) and d)(3).

[Authority for term: OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

Visible PE shall not exceed 5% opacity, as a 6-minute average, from the dust collector stack.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

f. Emission Limitation:

0.354 lb of PE/hr, from emissions units P023, P037, P038, P039, and P040 combined (stack emissions).

Applicable Compliance Method:

The hourly PE limitation was established by the following methodology:

$$\text{HER} = (\text{DCFR}) \times (\text{DCEF}) \times (\text{TI}) \times (\text{CONV}) = \text{lb PE/hr}$$

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, as appropriate.

[Authority for term: OAC rule 3745-77-07(C)(1)]



g. Emission Limitation:

1.550 tons of PE/yr, from emissions units P023, P037, P038, P039, and P040 combined (stack emissions).

Applicable Compliance Methods:

The annual PE limitation was established by multiplying the hourly PE limitation by the maximum operating schedule of 8,760 hrs/year, and dividing by 2,000 lbs/ton. Therefore, compliance with the annual PE limitation is ensured while compliance with the hourly PE limitation is maintained.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) Potential to emit calculations:

particulate emissions:

Controlled outlet emission rate from dust collector:

$(22,703 \text{ dscf/min}) \times (0.005 \text{ gr/dscf}) \times (60 \text{ min/hr}) \times (1 \text{ lb}/7,000 \text{ gr}) = 0.97 \text{ lb PE/hr}; \text{ and}$

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The terms in this permit supersede those identified in PTI 13-2382 issued 4/29/1992, PTI 13-2752 issued 11/17/1993, and PTI 13-03893 issued 11/16/2004.



**13. Emissions Unit Group -Pultrusion Press Group 5: P035, P036.**

EU ID	Operations, Property and/or Equipment Description
P035	Pultrusion press with a bath section, heated die and curing section, and a cut-off saw. Emissions controlled by a central dust collector.
P036	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.	OAC rule 3745-31-05(A)(3) PTI 13-03893 issued on 11/16/2004	Fugitive organic compound (OC) emissions shall not exceed 3.0/hr from each pultrusion line.  Fugitive OC emissions shall not exceed 40 lbs/day from each pultrusion line. .  Fugitive OC emissions shall not exceed 7.3 tons/yr from the pultrusion line.  Fugitive OC emissions shall not exceed 2.56 tons/yr from all cleanup material employed in P023, P026, P027, P028, P029, P030, P032, P033, P034, P035, P036, P037, P038, P039, P040, P065, P073, and P074 combined  Particulate emissions (PE) shall not exceed 0.475 lb/hr from emissions units P028, P033, P034, P035, and P036 combined (stack emissions).  PE shall not exceed 2.082 tons/yr from emissions units P028, P033, P034, P035, and P036 combined (stack emissions).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Visible PE shall not exceed 5% opacity, as a 6-minute average, from the dust collector stack.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW.</p>
b..	OAC rule 3745-17-07(A)(1)	The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-21-25	The requirements of this rule are equivalent to the MACT requirements in 40 CFR Part 63, Subpart WWWW.
e.	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 above 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 emission of organic material from the resin consists of styrene, a photchemically reactive materials and hazardous air pollutant (HAP).
- c. The OC emission factors used to calculate the OC 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, through the Cleveland DAQ, and Glastic Corporation South Euclid Facility.



- d. In accordance with paragraph (A)(3) of OAC rule 3745-21-25, upon achieving compliance with this rule, the reinforced plastic composite production operations at this facility are not required to meet the February 18, 2008 revision of OAC rule 3745-21-07.

c) Operational Restrictions

- (1) The permittee shall operate the dust collector whenever the emission units are in operation. The permittee shall maintain the dust collector filter 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.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (2) The permittee shall keep containers that store HAP containing resin 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.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart WWWW, Table 4]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain and record the following information for each day when the emission units are in operation:
  - a. the name and type of each pultrusion part;
  - b. the emission factor for each type of pultrusion part, in lbs of OC emissions/square foot of wet area/hr;
  - c. the wet area for each type of pultrusion part, in square feet;
  - d. the OC emissions for each type of pultrusion part, in lbs [(b) x (c)];
  - e. the total OC 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 OC emission rate in lbs/hr (e/f).

[Authority for term: OAC rule 3745-77-07(C)(1)]



- (2) The permittee shall maintain monthly records of the following information for all cleanup material employed for emissions units P023, P026, P027, P028, P029, P030, P032, P033, P034, P035, P036, P037, P038, P039, P040, P065, P073, and P074 combined:
- a. the volume of each cleanup material returned, in gallons;
  - b. the volume of each evaporated cleanup material, in gallons. This shall be calculated by subtracting the volume of each returned cleanup material from the volume of each dispensed cleanup material [(a) - (b)];
  - c. the OC content of each cleanup material employed, in lbs/gallon; and
  - d. the OC emissions from all cleanup materials employed, in lbs [the summation of (c) x (d) for all cleanup material employed].

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (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 and divided by 2,000 lbs/ton].

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (4) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stack serving this emissions unit. 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 emissions incident; and
- e. any corrective actions taken to eliminate the visible emissions.

If the weekly checks show visible emissions that are representative of normal operations 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.

[Authority for term: OAC rule 3745-77-07(A)(1)]



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

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the hourly and/or daily OC emission limitations for this emissions unit were exceeded, and what the hourly and daily OC emissions were for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit semiannual written reports that (a) identify all days during which any visible PE were observed from the stack serving this emissions unit 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall submit annual reports to the Cleveland Division of Air Quality that specify the total OC emissions (i.e., from all the pultrusion parts made on each pultrusion line and from cleanup material employed from all pultrusion lines) for the previous calendar year, in tons. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Reports.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (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.

[Authority for term: OAC rule 3745-77-07(C)(1)]



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. Emissions Limitation:

3.0 lbs of OC emissions/hr, from each pultrusion line (fugitive emissions).

Applicable Compliance Method:

The OC 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 OC emission limitation shall be determined by the record keeping requirements specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emissions Limitation:

40 lbs of OC emissions/day, from each pultrusion line (fugitive emissions).

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emissions Limitation:

7.3 tons of OC emissions/yr, from each pultrusion line (fugitive emissions).

Applicable Compliance Method:

The annual OC emission limitation was established by multiplying the daily OC emission limitation from the pultrusion line by 365 days/year, and dividing by 2,000 lbs/ton. Therefore compliance with the annual OC emission limitation is assumed while compliance is maintained with the daily OC emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

2.56 tons of OC emissions/yr, from all cleanup material employed for emissions units P023, P026, P027, P028, P029, P030, P032, P033, P034, P035, P036, P037, P038, P039, P040, P065, P073, and P074 combined (fugitive emissions).



Applicable Compliance Method:

Compliance with the annual OC emission limitation shall be determined by the record keeping requirements specified in d)(2) and d)(3).

[Authority for term: OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

Visible PE shall not exceed 5% opacity, as a 6-minute average, from the dust collector stack.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

f. Emission Limitation:

0.475 lb of PE/hr, from emissions units P028, P033, P034, P035, and P036 combined (stack emissions).

Applicable Compliance Method:

The hourly PE limitation was established by the following methodology:

$$\text{HER} = (\text{DCFR}) \times (\text{DCEF}) \times (\text{TI}) \times (\text{CONV}) = \text{lb PE/hr}$$

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, as appropriate.

[Authority for term: OAC rule 3745-77-07(C)(1)]



g. Emission Limitation:

2.082 tons of PE/yr, from emissions units P028, P033, P034, P035, and P036 combined (stack emissions).

Applicable Compliance Methods:

The annual PE limitation was established by multiplying the hourly PE limitation by the maximum operating schedule of 8,760 hrs/year, and dividing by 2,000 lbs/ton. Therefore, compliance with the annual PE limitation is ensured while compliance with the hourly PE limitation is maintained.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) Potential to emit calculations:

particulate emissions:

Controlled outlet emission rate from dust collector:

$(22,703 \text{ dscf/min}) \times (0.005 \text{ gr/dscf}) \times (60 \text{ min/hr}) \times (1 \text{ lb}/7,000 \text{ gr}) = 0.97 \text{ lb PE/hr}; \text{ and}$

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The terms in this permit supersede those identified in PTI 13-2382 issued 4/29/1992, PTI 13-2752 issued 11/17/1993, and PTI 13-03893 issued on 11/16/2004.